

**U.S. District Court  
Southern District of Florida (Miami)  
CRIMINAL DOCKET FOR CASE #: 1:24-mj-04616-EFD-2**

Case title: USA v. Alexander et al

Date Filed: 12/20/2024

Date Terminated: 01/08/2025

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Assigned to: Magistrate Judge Ellen  
F. D'Angelo

**Defendant (2)**

**Oren Alexander**  
52667-511  
*YOB: 1987; English*  
*TERMINATED: 01/08/2025*

represented by **Richard Carroll Klugh , Jr.**  
25 SE 2nd Avenue  
Suite 1100  
Miami, FL 33131  
305-536-1191  
Fax: 305-536-2170  
Email: [rickklu@aol.com](mailto:rickklu@aol.com)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Howard Milton Srebnick**  
Black Srebnick, P.A.  
201 S Biscayne Blvd, Ste 1300  
Miami, FL 33131  
305-371-6421  
Fax: 305-358-2006  
Email: [HSrebnick@RoyBlack.com](mailto:HSrebnick@RoyBlack.com)  
*ATTORNEY TO BE NOTICED*

**Joel M. Denaro**  
Joel Denaro, P.A.  
1000 Brickell Avenue  
Suite 201  
Miami, FL 33131  
305-371-1883  
Email: [jdenaro@joeldenarolaw.com](mailto:jdenaro@joeldenarolaw.com)  
*ATTORNEY TO BE NOTICED*  
*Designation: Temporary*

**Pending Counts**

None

**Disposition**

**Highest Offense Level (Opening)**

None

**Terminated Counts**

None

**Disposition****Highest Offense Level  
(Terminated)**

None

**Complaints****Disposition**

WARRANT\SOUTHERN  
DISTRICT OF NEW  
YORK\SUPERSEDING  
INDICTMENT\ 18 U.S.C. § 1594 –  
Conspiracy to commit sex  
trafficking by force, fraud, and  
coercion 18 U.S.C. §§ 1591(a),  
(b)(1) and 2 – Sex trafficking by  
force, fraud, and coercion, and  
aiding and abetting same

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**Plaintiff**

USA

represented by **Noticing AUSA CR TP/SR**  
Email: [Usafls.transferprob@usdoj.gov](mailto:Usafls.transferprob@usdoj.gov)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**  
*Designation: Retained*

**Lauren Alexandra Astigarraga**  
DOJ–USAO  
99 NE 4th St  
Miami, FL 33132  
305–961–9000  
Email: [lauren.astigarraga@usdoj.gov](mailto:lauren.astigarraga@usdoj.gov)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**  
*Designation: Retained*

Date Filed	#	Docket Text
01/08/2025	<u>35</u>	COMMITMENT TO ANOTHER DISTRICT as to Oren Alexander. Defendant committed to District of Southern District of New York. Closing Case for Defendant. Signed by Ch. Magistrate Judge Edwin G. Torres on 1/8/2025. <i>See attached document for full details.</i> (kan) (Entered: 01/09/2025)
01/08/2025	<u>34</u>	WAIVER of Rule 5(c)(3)/Rule 40 Hearing by Oren Alexander.(kan) (Entered: 01/09/2025)
01/08/2025	32	PAPERLESS Order Resetting Removal Hearing as to Oren Alexander

		<p>The Removal Hearing previously set for 1/9/2025 is now placed on the 1/8/2025 Duty Calendar in the Miami Division before Ch. Magistrate Judge Edwin G. Torres.</p> <p>Signed by Chief Magistrate Judge Edwin G. Torres on 1/8/2025. (MJS) (Entered: 01/08/2025)</p>
01/08/2025	<u>31</u>	<p>PAPERLESS Order Setting Removal Hearing as to Oren Alexander</p> <p>A Removal Hearing for Defendant Oren Alexander is set for the Duty Calendar on 1/9/2025 at 01:30 PM in the Miami Division before Chief Magistrate Judge Edwin G. Torres.</p> <p>Signed by Chief Magistrate Judge Edwin G. Torres on 1/8/2025. (MJS) (Entered: 01/08/2025)</p>
01/08/2025	<u>30</u>	<p>PAPERLESS Order Cancelling Pretrial Detention Hearing as to Oren Alexander</p> <p>Upon stipulation of the parties, the pre-trial detention hearing set for 01/08/25 at 3:30 PM is cancelled.</p> <p>Signed by Chief Magistrate Judge Edwin G. Torres on 1/8/2025. (MJS) (Entered: 01/08/2025)</p>
01/07/2025	<u>33</u>	<p>Minute Order for proceedings held before Ch. Magistrate Judge Edwin G. Torres: Status Conference RE: Pretrial Detention Hearing as to Oren Alexander held on 1/7/2025. The Parties stipulate to PTD with the right to revisit. No hearing held. Removal Hearing as to Oren Alexander held on 1/7/2025. Defendant waives removal. Defendant ordered removed to the Southern District of New York. (Digital 14:38:57) Signed by Ch. Magistrate Judge Edwin G. Torres (kan) (Entered: 01/09/2025)</p>
01/07/2025	<u>29</u>	<p>Minute Order for proceedings held before Ch. Magistrate Judge Edwin G. Torres: Status Conference re: Removal/Pretrial Detention hearing as to Oren Alexander held on 1/7/2025. Defendant not present; due to miscommunication with USMS. ( Pretrial Detention Hearing set for 1/8/2025 03:30 PM in Miami Division before MIA Duty Magistrate Judge., Removal Hearing set for 1/8/2025 03:30 PM in Miami Division before MIA Duty Magistrate Judge.). (Digital 13:45:17) Signed by Ch. Magistrate Judge Edwin G. Torres (fbn) (Entered: 01/07/2025)</p>
01/05/2025	<u>20</u>	<p>TRANSCRIPT of Detention and Removal Hearing as to Oren Alexander held on 1/3/2025 before Magistrate Judge Eduardo I. Sanchez, 1–18 pages, Court Reporter: Jill Wells, 305–523–5158 / Jill_Wells@flsd.uscourts.gov. (Digital EIS2501031016.41:009.) Transcript may be viewed at the court public terminal or purchased by contacting the Court Reporter/Transcriber before the deadline for Release of Transcript Restriction. After that date it may be obtained through PACER. Redaction Request due 1/27/2025. Redacted Transcript Deadline set for 2/5/2025. Release of Transcript Restriction set for 4/7/2025. (Wells, Jill) (Entered: 01/05/2025)</p>
01/03/2025	<u>27</u>	<p>Minute Order for proceedings held before Magistrate Judge Eduardo I. Sanchez: Status Conference re: Pretrial Detention and Removal Hearing as to Oren Alexander held on 1/3/2025. Defense Ore Tenus Motion to reset the Detention and Removal Hearing to 1/7/25–GRANTED. ( Pretrial Detention Hearing set for 1/7/2025 at 01:30 PM in the Miami Division before MIA Duty Magistrate Judge., Removal Hearing set for 1/7/2025 at 01:30 PM in the Miami Division before MIA Duty Magistrate Judge.). (Digital 11:07:22; 11:08:10) Signed by Magistrate Judge Eduardo I. Sanchez (fbn)</p>

		(Entered: 01/06/2025)
01/03/2025	26	PAPERLESS ORDER granting 25 Defense Motion to reset Pretrial Detention and Removal Hearing as to Oren Alexander (2). Pretrial Detention Hearing set for 1/7/2025 at 01:30 PM in the Miami Division before MIA Duty Magistrate Judge. Removal Hearing set for 1/7/2025 at 01:30 PM in the Miami Division before MIA Duty Magistrate Judge. Signed by Magistrate Judge Eduardo I. Sanchez (fbn) (Entered: 01/06/2025)
01/03/2025	25	<b>ORAL</b> DEFENSE MOTION to reset Detention and Removal Hearing by Oren Alexander. (fbn) (Entered: 01/06/2025)
01/02/2025	<u>16</u>	SUPPLEMENT to 8 Defendant's MOTION for Bond <i>Memorandum in Support</i> filed by Alon Alexander by Alon Alexander as to Alon Alexander, Oren Alexander (Astigarraga, Lauren) (Entered: 01/02/2025)
12/30/2024	<u>11</u>	ORDER granting <u>9</u> Motion for Limited Protective Order as to Alon Alexander (1), Oren Alexander (2). Signed by Magistrate Judge Eduardo I. Sanchez on 12/30/2024. <i>See attached document for full details.</i> (kan) Modified text on 12/30/2024 (kan). (Entered: 12/30/2024)
12/30/2024	10	PAPERLESS ORDER granting <u>7</u> Motion to Continue Detention Hearing as to Oren Alexander (2). Detention Hearing reset for 1/3/2025 10:00 AM in Miami Division before MIA Duty Magistrate Judge. Removal Hearing reset for 1/3/2025 10:00 AM in Miami Division before MIA Duty Magistrate Judge. Signed by Magistrate Judge Eduardo I. Sanchez on 12/30/2024. (kan) (Entered: 12/30/2024)
12/30/2024	<u>9</u>	MOTION for Protective Order by Alon Alexander, Oren Alexander. Attorney Lauren Alexandra Astigarraga added to party Alon Alexander(pty:dft), Attorney Lauren Alexandra Astigarraga added to party Oren Alexander(pty:dft). Responses due by 1/13/2025. (Attachments: # <u>1</u> Text of Proposed Order)(Astigarraga, Lauren) (Entered: 12/30/2024)
12/27/2024	<u>7</u>	Unopposed MOTION to Continue <i>Detention Hearing as to Oren Alexander</i> by Oren Alexander. Responses due by 1/10/2025. (Klugh, Richard) (Entered: 12/27/2024)
12/26/2024	<u>6</u>	NOTICE OF ATTORNEY APPEARANCE: Richard Carroll Klugh, Jr appearing for Oren Alexander . Attorney Richard Carroll Klugh, Jr added to party Oren Alexander(pty:dft). (Klugh, Richard) (Entered: 12/26/2024)
12/20/2024	<u>5</u>	Minute Order for proceedings held before Magistrate Judge Ellen F. D'Angelo: Initial Appearance as to Oren Alexander held on 12/20/2024. Bond recommendation/set: Oren Alexander (2) Government recommends PTD based on risk of flight and danger to the community. Date of Arrest or Surrender: 12/19/2024. Detention Hearing set for 12/30/2024 10:00 AM in Miami Division before MIA Duty Magistrate Judge. Removal Hearing set for 12/30/2024 10:00 AM in Miami Division before MIA Duty Magistrate Judge. (Digital 14:16:10) Signed by Magistrate Judge Ellen F. D'Angelo (fbn) (Entered: 12/23/2024)
12/20/2024	<u>3</u>	NOTICE OF TEMPORARY ATTORNEY APPEARANCE: Joel M. Denaro appearing for Oren Alexander (at) (Entered: 12/23/2024)
12/20/2024	<u>1</u>	Magistrate Judge Removal of Superseding Indictment from Southern District of New York Case number in the other District 24-CR-676 as to Alon Alexander (1), Oren Alexander (2). (kan) (Entered: 12/20/2024)

## UNITED STATES DISTRICT COURT

for the

Southern District of New York

FILED BY mp D.C.

Dec 20, 2024

ANGELA E. NOBLE  
CLERK U.S. DIST. CT.  
S. D. OF FLA. - MiamiUnited States of America  
v.

Alon Alexander

Defendant

24-MJ-4616-D'ANGELO

Case No.

24 CRIM 676

## ARREST WARRANT

To: Any authorized law enforcement officer

**YOU ARE COMMANDED** to arrest and bring before a United States magistrate judge without unnecessary delay(name of person to be arrested) Alon Alexander

who is accused of an offense or violation based on the following document filed with the court:

- ☒ Indictment   
 ☐ Superseding Indictment   
 ☐ Information   
 ☐ Superseding Information   
 ☐ Complaint  
☐ Probation Violation Petition   
 ☐ Supervised Release Violation Petition   
 ☐ Violation Notice   
 ☐ Order of the Court

This offense is briefly described as follows:

18 U.S.C. § 1594 - conspiracy to commit sex trafficking by force, fraud, and coercion

18 U.S.C. §§ 1591(a), (b)(1) and 2 - sex trafficking by force, fraud, and coercion, and aiding and abetting same

Tammi M. Hellwig

Date: 12/06/2024

Issuing officer's signature

City and state: New York, New York

Tammi M. Hellwig

Printed name and title

## Return

This warrant was received on (date) \_\_\_\_\_, and the person was arrested on (date) \_\_\_\_\_  
at (city and state) \_\_\_\_\_.

Date: \_\_\_\_\_

Arresting officer's signature

Printed name and title

## UNITED STATES DISTRICT COURT

for the

Southern District of New York

FILED BY mp D.C.

Dec 20, 2024

ANGELA E. NOBLE  
CLERK U.S. DIST. CT.  
S. D. OF FLA. - Miami

United States of America

v.

Oren Alexander

Defendant

24-MJ-4616-D'ANGELO

Case No.

24-MJ-4616-D'ANGELO

## ARREST WARRANT

To: Any authorized law enforcement officer

**YOU ARE COMMANDED** to arrest and bring before a United States magistrate judge without unnecessary delay(name of person to be arrested) Oren Alexander

who is accused of an offense or violation based on the following document filed with the court:

☒ Indictment    ☐ Superseding Indictment    ☐ Information    ☐ Superseding Information    ☐ Complaint  
☐ Probation Violation Petition    ☐ Supervised Release Violation Petition    ☐ Violation Notice    ☐ Order of the Court

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18 U.S.C. §§ 1591(a), (b)(1) and 2 - sex trafficking by force, fraud, and coercion, and aiding and abetting same

Date: 12/06/2024*Tammi M. Hellwig*

Issuing officer's signature

City and state: New York, New York**Tammi M. Hellwig**

Printed name and title

## Return

This warrant was received on (date) \_\_\_\_\_, and the person was arrested on (date) \_\_\_\_\_  
at (city and state) \_\_\_\_\_.

Date: \_\_\_\_\_

Arresting officer's signature

Printed name and title

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

ALON ALEXANDER,  
OREN ALEXANDER, and  
TAL ALEXANDER,

Defendants.

**24-MJ-4616-D'ANGELO**

**SUPERSEDING INDICTMENT**

S1 24 Cr. 676

**COUNT ONE**  
**(Conspiracy to Commit Sex Trafficking)**

The Grand Jury charges:

**OVERVIEW**

1. For well over a decade and at all times relevant to this indictment, ALON ALEXANDER, OREN ALEXANDER, and TAL ALEXANDER (collectively, the “ALEXANDER BROTHERS”), the defendants, worked together and with others known and unknown, to repeatedly and violently drug, sexually assault, and rape dozens of victims. At times, the ALEXANDER BROTHERS arranged for these sexual assaults well in advance, using the promise of luxury experiences, travel, and accommodations to lure and entice women to locations where they were then forcibly raped or sexually assaulted, sometimes by multiple men, including one or more of the ALEXANDER BROTHERS. Other times, the ALEXANDER BROTHERS encountered and chose their victims by chance. Often, the ALEXANDER BROTHERS drugged their victims before assaulting them, preventing them from fighting back or escaping.

2. ALON ALEXANDER, OREN ALEXANDER, and TAL ALEXANDER, the defendants, worked together and with others to carry out and facilitate their sex trafficking scheme,



including on some occasions by committing forcible rapes and sexual assaults together and with others, jointly arranging domestic and international travel and accommodations, and jointly financing the scheme.

### **BACKGROUND**

3. ALON ALEXANDER, OREN ALEXANDER, and TAL ALEXANDER, the defendants, are brothers. ALON ALEXANDER and OREN ALEXANDER are twins and TAL ALEXANDER is approximately one year older. At all times relevant to this Indictment, OREN ALEXANDER and TAL ALEXANDER were real estate agents who focused on ultra-luxury markets in New York City, Miami, Florida, and other locations. Since at least in or around 2012, ALON ALEXANDER has been an executive of a private security firm owned and operated by his family.

4. Starting in at least in or about 2010, ALON ALEXANDER, OREN ALEXANDER, and TAL ALEXANDER, the defendants, and others known and unknown, operated a long-running sex trafficking scheme, as part of which they raped and sexually assaulted women to whom they had provided material benefits, including domestic and international travel to vacation destinations, luxury accommodations at high-end hotels and vacation properties, and access to other luxury experiences and events. The ALEXANDER BROTHERS' scheme was based in, among other places, Manhattan, New York and Miami, Florida, where the defendants maintained residences and where their businesses were based.

5. To carry out and facilitate their sex trafficking scheme, ALON ALEXANDER, OREN ALEXANDER, and TAL ALEXANDER, the defendants, used deception, fraud, and coercion, to cause victims to travel with them or meet them in private locations. Thereafter, the ALEXANDER BROTHERS used various methods, including drugging the victims and, at times,



physical force, to rape and sexually assault the victims—sometimes alone and sometimes together. In particular, the defendants used the following means and methods, among others, to carry out their sex trafficking scheme:

a. The ALEXANDER BROTHERS used their wealth and positions to create and facilitate opportunities to rape and sexually assault women. In particular, on multiple occasions, OREN ALEXANDER and TAL ALEXANDER used their prominent positions in the real estate industry to induce other women to attend events and parties, and to meet other women at those events and parties, whom one or more of the defendants later sexually assaulted.

b. The ALEXANDER BROTHERS worked together and with other men to arrange events and domestic and international trips they used as bait to recruit, entice, harbor, transport, and maintain multiple women. During the events and trips, the defendants frequently raped and sexually assaulted the women they enticed to attend.

c. At times, the ALEXANDER BROTHERS used social connections or the guise of starting a relationship to lure and entice women to meet with one or more of them at a public place or group event, or to travel to meet one or more of the defendants. On multiple occasions, the defendants—alone or together—then sexually assaulted the woman, sometimes within hours of their meeting. Immediately following the sexual assaults, the defendants sometimes offered the victims material items, including travel, concert tickets, and other luxury experiences.

d. Some trips and events were organized by the ALEXANDER BROTHERS well in advance and involved domestic and international travel. The ALEXANDER BROTHERS worked together and with others to recruit women to attend these events and trips. The defendants, at times with others, shared photographs of women to select those they found sufficiently attractive

to invite. The defendants and other men organizing the trip then contacted the women, including through social media or dating applications, and induced the women to attend by, among other things, offering to purchase their flights, making other travel arrangements, and/or providing accommodations without charge.

e. In addition to inviting women to their events directly, the ALEXANDER BROTHERS and others worked with party promoters to arrange for women to attend events or travel with them, in order to ensure that there were a sufficient number of women present.

f. On some occasions, after the women accepted the invitations to attend a particular event, the ALEXANDER BROTHERS transported women and caused women to be transported across state and international lines. The defendants and other men attending the trips pooled financial resources in order to pay for flights and other travel expenses for the women.

g. In advance of the events, the ALEXANDER BROTHERS and others procured drugs that they agreed to provide to the women, including, among other things, cocaine, mushrooms, and GHB. On multiple occasions during these events and trips, the ALEXANDER BROTHERS and others surreptitiously drugged women's drinks. Some of the victims experienced symptoms of impaired physical and mental capacity, including limitations of movement and speech and incomplete memories of events.

h. The ALEXANDER BROTHERS, sometimes acting alone, sometimes with each other, and sometimes with other men, forcibly raped or sexually assaulted their victims. At times, the defendants physically restrained and held down their victims during the rapes and sexual assaults and ignored screams and explicit requests to stop.

6. The agreement between ALON ALEXANDER, OREN ALEXANDER, and TAL ALEXANDER, the defendants, encompassed numerous other acts of sexual violence in addition

to sexual assaults during planned trips and events. On numerous occasions, the ALEXANDER BROTHERS drugged and raped or sexually assaulted women they encountered by chance, including women they met at bars and nightclubs, social events, and on dating applications. The ALEXANDER BROTHERS similarly carried out these rapes and sexual assaults by, among other things, drugging and incapacitating victims, taking victims to isolated locations, physically restraining victims while raping and sexually assaulting them alone, together, and with other men, and ignoring victims' explicit demands to stop.

### **STATUTORY ALLEGATIONS**

7. From at least in or about 2010, up to and including at least in or about 2021, in the Southern District of New York and elsewhere, in and affecting interstate commerce, ALON ALEXANDER, OREN ALEXANDER, and TAL ALEXANDER, the defendants, and others known and unknown, knowingly, did combine, conspire, confederate and agree to recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit, by any means, persons, and to benefit, financially and by receiving anything of value, from participation in a venture which has engaged in any such act, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, as described in Title 18, United States Code, Section 1591(e)(2), and any combination of such means, would be used to cause the persons to engage in commercial sex acts, in violation of Title 18, United States Code, Section 1591(a)(1) and (b)(1), to wit, ALON ALEXANDER, OREN ALEXANDER, and TAL ALEXANDER, and others known and unknown, agreed to recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit women, including but not limited to Victim-1 and Victim-2, as alleged in Counts Two and Three respectively, knowing and in reckless disregard of the fact that force, threats of force, fraud, and coercion, would be used to cause the women, including but not

limited to Victim-1 and Victim-2, to engage in commercial sex acts.

(Title 18, United States Code, Section 1594(c).)

**COUNT TWO**  
**(Sex Trafficking of Victim-1 by Force, Fraud, or Coercion)**

The Grand Jury further charges:

8. In or about July 2011, in the Southern District of New York and elsewhere, TAL ALEXANDER, the defendant, knowingly, in and affecting interstate and foreign commerce, did recruit, entice, harbor, transport, provide, obtain, and maintain by any means a person, and did benefit, financially and by receiving anything of value, from participation in a venture which has engaged in any such act, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, as described in Title 18, United States Code, Section 1591(e)(2), and any combination of such means, would be used to cause the person to engage in commercial sex acts, to wit, TAL ALEXANDER recruited, enticed, harbored, transported, provided, obtained, and maintained, and aided and abetted the recruitment, enticement, harboring, transportation, obtaining, and maintaining of, Victim-1, and caused Victim-1 to engage in at least one commercial sex act, knowing, and in reckless disregard of the fact that Victim-1 was engaging in the commercial sex act as result of force, fraud and coercion.

(Title 18, United States Code, Sections 1591(a) and (b)(1), and (2).)

**COUNT THREE**  
**(Sex Trafficking of Victim-2 by Force, Fraud, or Coercion)**

The Grand Jury further charges:

9. In or about September 2016, in the Southern District of New York and elsewhere, ALON ALEXANDER, OREN ALEXANDER, and TAL ALEXANDER, the defendants, knowingly, in and affecting interstate and foreign commerce, did recruit, entice,

harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means a person, and did benefit, financially and by receiving anything of value, from participation in a venture which has engaged in any such act, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, as described in Title 18, United States Code, Section 1591(e)(2), and any combination of such means, would be used to cause the person to engage in commercial sex acts, in violation of Title 18, United States Code, Section 1591(a)(1) and (b)(1), to wit ALON ALEXANDER, OREN ALEXANDER, and TAL ALEXANDER recruited, enticed, harbored, transported, provided, obtained, maintained, patronized, and solicited, and aided and abetted the recruitment, enticement, harboring, transportation, obtaining, maintaining, patronizing, and soliciting of, Victim-2, and caused Victim-2 to engage in at least one commercial sex act, knowing, and in reckless disregard of the fact that Victim-2 was engaging in the commercial sex act as result of force, fraud and coercion.

(Title 18, United States Code, Sections 1591(a) and (b)(1), and (2).)

### **FORFEITURE ALLEGATIONS**

10. As a result of committing the offenses alleged in Counts One through Three of this Indictment, ALON ALEXANDER, OREN ALEXANDER, and TAL ALEXANDER, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1594, any and all property, real and personal, involved in, used, or intended to be used to commit or to facilitate the commission of said offenses; any and all property, real and personal, constituting or derived from proceeds obtained, directly or indirectly, as a result of said offenses; and any and all property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of property involved in said offense and proceeds traceable to the commission of said offenses.

**Substitute Assets Provision**


11. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to Title 18, United States Code, Section 1963(m) and Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 1594;  
Title 21, United States Codes, Section 853; and  
Title 28, United States Code, Section 2461.)

  
FOREPERSON

  
DAMIAN WILLIAMS  
United States Attorney

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 24 MJ 4616 - Denaro

UNITED STATES OF AMERICA,  
Plaintiff,

v.

**NOTICE OF TEMPORARY  
APPEARANCE AS COUNSEL**

Oren Alexander

Defendant.

COMES NOW JOEL DENARO and

files this temporary appearance as counsel for the above named defendant(s) at initial appearance.

This appearance is made with the **understanding** that the undersigned counsel will fulfill any **obligations imposed** by the Court such as **preparing and filing documents** necessary to collateralize any personal surety bond which may be set.

Counsel's Name (Printed): JOEL DENARO

Counsel's Signature: Joel Denaro

Address (include City/State/Zip Code):

1000 Brickell Ave  
Suite 201 Miami Fla 33131

Telephone: 305-371 1805 Florida Bar Number: 0164460

Date: Dec 20, 2024



**MINUTE ORDER**

Page 7

**Magistrate Judge Ellen F. D'Angelo****King Building Courtroom 10-4****Date: 12/20/24 Time: 2:00 p.m.**Defendant: Oren Alexander J#: 52667-511 Case #: 24-MJ-4616-D'ANGELOAUSA: Angela Benoit Attorney: Joel Denaro (Temp)Violation: Conspiracy to Commit Sex Trafficking by Force, Fraud and Coercion/Sex Trafficking by Force, Fraud & Coercion Surr/Arrest Date: 12/19/24 YOB: 1987Proceeding: Initial Appearance CJA Appt: \_\_\_\_\_Bond/PTD Held: ☐ Yes ☐ No Recommended Bond: Pretrial Detention

Bond Set at: \_\_\_\_\_ Co-signed by: \_\_\_\_\_

☐ Surrender and/or do not obtain passports/travel docsLanguage: English☐ Report to PTS as directed/or \_\_\_\_\_ x's a week/month by phone: \_\_\_\_\_ x's a week/month in person

Disposition:

Random urine testing by Pretrial

☐ Services

Defendant advised of rights and charges. Defendant sworn.

Treatment as deemed necessary

Government recommends Pretrial

☐ Refrain from excessive use of alcohol

Detention based on risk of flight and danger to the community. Court grants recommendation, defendant held.

☐ Participate in mental health assessment & treatment☐ Maintain or seek full-time employment/education☐ No contact with victims/witnesses, except through counsel☐ No firearms☐ Not to encumber property☐ May not visit transportation establishments☐ Home Confinement/Electronic Monitoring and/or

Curfew \_\_\_\_\_ pm to \_\_\_\_\_ am, paid by \_\_\_\_\_

☐ Allowances: Medical needs, court appearances, attorney visits, religious, employment☐ Travel extended to: \_\_\_\_\_☐ Other: \_\_\_\_\_

Time from today to \_\_\_\_\_ excluded from Speedy Trial Clock

**NEXT COURT APPEARANCE** Date: \_\_\_\_\_ Time: \_\_\_\_\_ Judge: \_\_\_\_\_ Place: \_\_\_\_\_

Report RE Counsel: \_\_\_\_\_

PTD/Bond Hearing: **12/30/24 @ 10:00 am** **MIAMI DUTY**Prelim/Arraign or Removal: **12/30/24 @ 10:00 am** **MIAMI DUTY**

Status Conference RE: \_\_\_\_\_

D.A.R. 14:16:10 Time in Court: 7s/Ellen F. D'Angelo

Magistrate Judge

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 24-mj-04616-D'ANGELO

UNITED STATES of AMERICA,

Plaintiff,

v.

OREN ALEXANDER,

Defendant.

\_\_\_\_\_ /

**NOTICE OF PERMANENT APPEARANCE OF COUNSEL**

Notice is hereby given that attorney Richard C. Klugh, of the law firm Klugh Wilson LLC, hereby appears as counsel for Oren Alexander in this case in substitution of prior temporary counsel.

Respectfully submitted,

KLUGH WILSON LLC

By: /s/ Richard C. Klugh

Richard C. Klugh  
Attorney for Defendant  
40 N.W. 3rd Street, PH 1  
Miami, Florida 33128  
Fla. Bar No. 305294  
Tel: (305) 536-1191

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 24-mj-04616-D'ANGELO

UNITED STATES of AMERICA,

Plaintiff,

v.

OREN ALEXANDER,

Defendant.

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**MOTION TO CONTINUE DETENTION HEARING FROM  
MONDAY, DECEMBER 30, 2024 TO FRIDAY, JANUARY 3, 2025**

Oren Alexander, through undersigned counsel, hereby moves to briefly continue his detention hearing for a period of four days from Monday to Friday of next week to permit recently retained counsel to complete preparation for the hearing and to accommodate counsel's need to prepare for and obtain a retinal surgical procedure scheduled for next week. Mr. Alexander states the following grounds in support of this continuance.

Mr. Alexander made his initial appearance on December 20, 2024, and a detention hearing is currently scheduled for December 30, 2024. Since making his initial appearance, Mr. Alexander has made arrangements to retain undersigned counsel to represent him, and undersigned counsel entered his appearance in this matter yesterday.

The instant case presents multiple complex factual and legal issues. Bond

proceedings as to a co-defendant were lengthy and involved detailed financial, biographical, and other matters as to which undersigned counsel has just commenced reviewing to assure that the presentation made on the defendant's behalf is accurate and complete. At the same time, counsel is scheduled for a surgical treatment for retinal problems in the coming week, for which preparation is required and resolution is needed. Counsel has been using steroids to mitigate side effects of the vision problem and will be best able to proceed with the hearing following the scheduled treatment. To assure that the defendant has the benefit of adequate representation at the crucial detention hearing scheduled for next week, we request a brief continuance of four days, to Friday, January 3, 2025..

Independently of counsel's recent bout with retinal and related issues, counsel has identified specific needs for additional investigation and record preparation anticipatory to the detention hearing. The facts are complex, and it will take time to reach out to witnesses, research the relevant factual and legal issues, and gather evidence to present to the Court.

Mr. Alexander is thus requesting a brief continuance of his detention hearing to Friday, Jan. 3, 2025. Undersigned counsel conferred with counsel for the government. Assistant United States Attorney Kaiya Orroyo represented that the government does not oppose the continuance, provided that Mr. Oren Alexander agrees to accept the testimony of the agents at Tal and Alon Alexander's hearings, given the resources required to transport an agent to the Southern District of Florida. Oren Alexander agrees to this modification and requests the continuance pursuant to this agreement.

WHEREFORE, the defendant, Oren Alexander, hereby requests that his detention hearing be continued to Friday, Jan. 3, 2025.

Respectfully submitted,

KLUGH WILSON LLC

By: /s/ Richard C. Klugh  
Richard C. Klugh  
Attorney for Defendant  
40 N.W. 3rd Street, PH 1  
Miami, Florida 33128  
Fla. Bar No. 305294  
Tel: (305) 536-1191

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 24-mj-4616**

**UNITED STATES OF AMERICA**

**v.**

**ALON ALEXANDER, and  
OREN ALEXANDER**

**Defendants,**

**/**

**MOTION FOR A LIMITED PROTECTIVE ORDER  
REGULATING DISCLOSURE OF *JENCKS*/SECTION 3500 MATERIAL**

Pursuant to Federal Rule of Criminal Procedure 16(d), the United States of America files this motion for a protective order regulating disclosure of the *Jencks*/Section 3500 material in this case and certain sensitive information contained therein that has been requested by the defendants in connection with a pre-trial detention hearing. The United States has conferred with counsel for the defendants, who, with the exception to the objection to one provision of the proposed order, described below, do not object to the entry of a protective order.

On December 11, 2024, a grand jury sitting in the Southern District of New York returned a superseding indictment, S1 24 Cr. 676 (VEC) (S.D.N.Y) (the “Indictment”), charging the Defendants in two counts each with: (1) participating in a sex trafficking conspiracy from at least 2010 through at least 2021, in violation of 18 U.S.C. § 1594(c) (Count One); and (2) sex trafficking Victim-2 by force, fraud, and coercion, in violation of 18 U.S.C. §§ 1591(a) and (b)(1) and 2 (Count Three). The defendants were arrested on December 11, 2024, and were processed in Miami-Dade County Criminal Court for separate charges of committing one or more sexual assaults in violation of Florida law. On December 19, 2024, the defendants were transferred to

federal custody to face the charges in the Indictment. During an initial appearance before Judge Ellen F. D'Angelo on December 20, 2024, a detention hearing was scheduled for December 30, 2024. (Dkt. nos. 4 and 5). In advance of the detention hearing, counsel for the defendants have requested *Jencks*/Section 3500 material for the witness expected to testify at that hearing (the "Requested Materials").

The Requested Materials include sensitive information concerning government witnesses and the evidence in the criminal case against the defendant. In the normal course of litigation, the Requested Materials would be produced later, in accordance with the discovery schedule set in the District Court, and subject to the terms of a protective order issued by that court. As the defendants have not yet made an appearance in New York, and because counsel for the defendants in the New York case have not yet been identified, there is not yet a discovery schedule set in that court, and there is not yet a protective order.

In the absence of a discovery schedule and protective order in the District Court, the Government agrees to produce the Requested Materials<sup>1</sup> prior to the cross-examination of the Government's witness at the pre-trial detention hearing. However, the Government seeks protections that will protect against the improper dissemination or use of the Requested Materials. The Government respectfully submits that the equities favor this Court placing reasonable limitations on the way the defense may use the Requested Materials in relation to the pre-trial detention hearing. Rule 16(d)(1) of the Federal Rules of Criminal Procedure provides that the Court "may, for good cause, deny, restrict, or defer discovery or inspection" of discovery materials.

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<sup>1</sup> The Government's witness is the author of an FBI report that contains the witness's secondary account of the sexual assault of one victim. At the detention hearing, the Government will move orally for a ruling that the report is beyond the scope of the agent's testimony at the hearing and therefore not subject to production, and/or that good cause exists, pursuant to Federal Rule of Criminal Procedure 46(j), to not require the production of the report.



The Court has broad discretion to regulate and restrict discovery and the disclosure of discovery materials. *See United States v. Campa*, 529 F.3d 980, 995 (11th Cir. 2008) (recognizing the “broad authority of the district court to regulate discovery”); *see also Alderman v. United States*, 394 U.S. 165, 185 (1969) (“[T]he trial court can and should, where appropriate, place a defendant and his counsel under enforceable orders against unwarranted disclosure of the materials which they may be entitled to inspect.”).

In light of the foregoing, the United States respectfully requests that the Court enter an order placing the following restrictions on the pre-trial detention discovery materials to be made available to the defendants for the pre-trial detention hearing in this case:

1. Counsel for the Government will provide the *Jencks*/Section 3500 materials to counsel for the defendants for use during cross examination at a pre-trial detention hearing, in paper form or electronically in a “view only” format, prior to the Government’s obligation to produce discovery in this case;
2. Counsel for the defendants shall not provide the *Jencks*/Section 3500 material to any person except as specified by the Court, nor make any copies of the *Jencks*/Section 3500 material;
3. Counsel for the defendants shall not disclose any of the information in the *Jencks*/Section 3500 material to anyone other than the named defendants, attorneys of record for the named defendants and attorneys, or staff from that defense counsels’ law offices in order to prepare for the cross-examination of the government agent at the pre-trial detention hearing;
4. Counsel for the defendants shall maintain a list of all individuals to whom the information contained in the *Jencks*/Section 3500 material was disclosed; this list is not subject to disclosure to the Government;
5. Counsel for the defendants will return the hard copies of the *Jencks*/Section 3500 material at the conclusion of the pre-trial detention hearing at which the government agent is testifying; electronic “view only” access to the material will end at the same time; and
6. Counsel for the Government and for the defendants shall promptly report any known violations of the Court’s order to the Court.

The undersigned has conferred with counsel for the defendants about the proposed order. Defense counsel does not object to the entry of a protective order but does object to the provision in paragraph 5 that the materials must be returned “at the conclusion of the pre-trial detention hearing at which the government agent is testifying.” Defense counsel instead seeks to maintain the materials through the completion of a detention hearing for Oren Alexander at which no agent would testify, which counsel has requested to take place on January 3, 2025.<sup>2</sup> The Government opposes the defendants’ request to maintain the materials for a hearing where the agent would not testify because “Jencks Act statements are strictly limited to impeachment” and therefore have no applicability at a hearing without testimony. *United States v. Delgado*, 56 F.3d 1357, 1364 (11th Cir. 1995).

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<sup>2</sup> Counsel for Oren Alexander has asked to adjourn his detention hearing from December 30, 2024, until January 3, 2025. (Dkt. no. 7). In making the request for the adjournment, counsel has agreed to forgo additional government witness testimony and cross examination at a rescheduled hearing and to accept the agent testimony from the detention hearings for Tal Alexander and Alon Alexander. (*Id.* at 2). The Government did not oppose the adjournment request, subject to the agreement that the defendant would accept the agent testimony from the prior hearings.

WHEREFORE the United States of America respectfully moves this Court to issue the proposed Limited Protective Order.

Respectfully submitted,

MARKENZY LAPOINTE  
UNITED STATES ATTORNEY

By: /s/ Lauren A. Astigarraga  
Lauren A. Astigarraga  
Assistant United States Attorney  
FL Bar No. 0119473  
99 N.E. 4<sup>th</sup> Street  
Miami, FL 33132  
Telephone (305) 961-9105  
Lauren.Astigarraga@usdoj.gov

EDWARD Y. KIM  
ACTING UNITED STATES ATTORNEY  
SOUTHERN DISTRICT OF NEW YORK

By: /s/  
Kaiya Arroyo  
Elizabeth A. Espinosa  
Andrew Jones  
Assistant United States Attorneys  
26 Federal Plaza, 37th Floor  
New York, NY 10278  
Telephone (212) 637-2249  
Andrew.Jones2@usdoj.gov

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 24-mj-4616

UNITED STATES OF AMERICA

v.

ALON ALEXANDER, and  
OREN ALEXANDER

Defendants,

/

**LIMITED PROTECTIVE ORDER**

**THIS CAUSE** came before the Court on the Government's Motion for a Limited Protective Order Regulating Disclosure of *Jencks*/Section 3500 Material. Having considered the Government's Motion, and being otherwise fully advised in this premises, it is hereby **ORDERED** and **ADJUDGED** that the Government's Motion is **GRANTED**. Pursuant to Federal Rule of Criminal Procedure 16(d), it is further ordered that:

1. Counsel for the Government will provide the *Jencks*/Section 3500 materials to counsel for the defendants for use during cross examination at a pre-trial detention hearing, in paper form or electronically in a "view only" format, prior to the Government's obligation to produce discovery in this case;
2. Counsel for the defendants shall not provide the *Jencks*/Section 3500 material to any person except as specified by the Court, nor make any copies of the *Jencks*/Section 3500 material;
3. Counsel for the defendants shall not disclose any of the information in the *Jencks*/Section 3500 material to anyone other than the named defendants, attorneys of record for the named defendants and attorneys, or staff from that defense counsels' law offices in order to prepare for the cross-examination of the government agent at the pre-trial detention hearing;
4. Counsel for the defendants shall maintain a list of all individuals to whom the information contained in the *Jencks*/Section 3500 material was disclosed; this list is not subject to disclosure to the Government;

5. Counsel for the defendants will return the hard copies of the *Jencks*/Section 3500 material at the conclusion of the pre-trial detention hearing at which the government agent is testifying; electronic “view only” access to the material will end at the same time; and
6. Counsel for the Government and for the defendants shall promptly report any known violations of the Court’s order to the Court.

**DONE AND ORDERED** in Miami, Florida, this \_\_\_\_ day of December, 2024.

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EDUARDO I. SANCHEZ  
UNITED STATES MAGISTRATE JUDGE

MIME-Version:1.0  
From:cmechautosender@flsd.uscourts.gov  
To:flsd\_cmech\_notice  
Bcc:  
--Case Participants: Lauren Alexandra Astigarraga (andrea.samper@usdoj.gov, caseview.ecf@usdoj.gov, lauren.astigarraga@usdoj.gov, usafls-hqdk@usdoj.gov), Joel M. Denaro (jdenaro@joeldenarolaw.com), Richard Carroll Klugh, Jr (allison.bradley@uprfirm.com, klughlawoffice@gmail.com, rickklu@aol.com), Noticing AUSA CR TP/SR (usafls.transferprob@usdoj.gov), Howard Milton Srebnick (blacksrebnick@ecf.courtdrive.com, hreiner@royblack.com, hsrebnick@royblack.com), Magistrate Judge Ellen F. D'Angelo (dangelo@flsd.uscourts.gov)  
--Non Case Participants:  
--No Notice Sent:  
  
Message-Id:25068618@flsd.uscourts.gov  
Subject:Activity in Case 1:24-mj-04616-EFD USA v. Alexander et al Order on Motion to Continue  
Content-Type: text/html

**U.S. District Court**

**Southern District of Florida**

**Notice of Electronic Filing**

The following transaction was entered on 12/30/2024 at 10:15 AM EST and filed on 12/30/2024

**Case Name:** USA v. Alexander et al

**Case Number:** 1:24-mj-04616-EFD

**Filer:**

**Document Number:** 10(No document attached)

**Docket Text:**

**PAPERLESS ORDER granting [7] Motion to Continue Detention Hearing as to Oren Alexander (2). Detention Hearing reset for 1/3/2025 10:00 AM in Miami Division before MIA Duty Magistrate Judge. Removal Hearing reset for 1/3/2025 10:00 AM in Miami Division before MIA Duty Magistrate Judge. Signed by Magistrate Judge Eduardo I. Sanchez on 12/30/2024. (kan)**

**1:24-mj-04616-EFD-2 Notice has been electronically mailed to:**

Noticing AUSA CR TP/SR &nbsp; &nbsp; Usafls.transferprob@usdoj.gov

Howard Milton Srebnick &nbsp; &nbsp; HSrebnick@RoyBlack.com, blacksrebnick@ecf.courtdrive.com, hreiner@royblack.com

Joel M. Denaro &nbsp; &nbsp; jdenaro@joeldenarolaw.com

Lauren Alexandra Astigarraga &nbsp; &nbsp; lauren.astigarraga@usdoj.gov, Andrea.Samper@usdoj.gov, CaseView.ECF@usdoj.gov, usafls-hqdk@usdoj.gov

Richard Carroll Klugh , Jr &nbsp; &nbsp; rickklu@aol.com, allison.bradley@uprfirm.com, klughlawoffice@gmail.com

**1:24-mj-04616-EFD-2 Notice has not been delivered electronically to those listed below and will be provided by other means. For further assistance, please contact our Help Desk at 1-888-318-2260.:**



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 24-mj-4616

UNITED STATES OF AMERICA

v.

ALON ALEXANDER, and  
OREN ALEXANDER

Defendants,

/

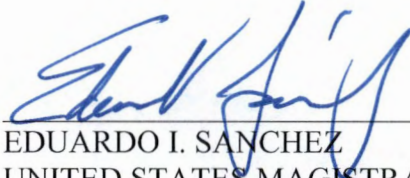
**LIMITED PROTECTIVE ORDER**

**THIS CAUSE** came before the Court on the Government's Motion for a Limited Protective Order Regulating Disclosure of *Jencks*/Section 3500 Material. Having considered the Government's Motion, and being otherwise fully advised in this premises, it is hereby **ORDERED** and **ADJUDGED** that the Government's Motion is **GRANTED**. Pursuant to Federal Rule of Criminal Procedure 16(d), it is further ordered that:

1. Counsel for the Government will provide the *Jencks*/Section 3500 materials to counsel for the defendants for use during cross examination at a pre-trial detention hearing, in paper form or electronically in a "view only" format, prior to the Government's obligation to produce discovery in this case;
2. Counsel for the defendants shall not provide the *Jencks*/Section 3500 material to any person except as specified by the Court, nor make any copies of the *Jencks*/Section 3500 material;
3. Counsel for the defendants shall not disclose any of the information in the *Jencks*/Section 3500 material to anyone other than the named defendants, attorneys of record for the named defendants and attorneys, or staff from that defense counsels' law offices in order to prepare for the cross-examination of the government agent at the pre-trial detention hearing;
4. Counsel for the defendants shall maintain a list of all individuals to whom the information contained in the *Jencks*/Section 3500 material was disclosed; this list is not subject to disclosure to the Government;

5. Counsel for the defendants will return the hard copies of the *Jencks*/Section 3500 material at the conclusion of the pre-trial detention hearing at which the government agent is testifying; electronic “view only” access to the material will end at the same time; and
6. Counsel for the Government and for the defendants shall promptly report any known violations of the Court’s order to the Court.

**DONE AND ORDERED** in Miami, Florida, this 30<sup>th</sup> day of December, 2024.



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EDUARDO I. SANCHEZ  
UNITED STATES MAGISTRATE JUDGE

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 24-mj-4616**

**UNITED STATES OF AMERICA**

**vs.**

**ALON ALEXANDER, and  
OREN ALEXANDER**

**Defendants,**

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**SUPPLEMENTAL MEMORANDUM IN OPPOSITION TO  
DEFENDANTS' MOTIONS FOR PRETRIAL RELEASE**

The government respectfully submits this brief supplemental memorandum in further opposition of the application for pretrial release by the Defendants, Alon Alexander and Oren Alexander. Specifically, the government writes to address the proposed bail package, which amounts to a private jail in the residence of a family friend.

“[T]he Bail Reform Act does not permit a two-tiered bail system in which defendants of lesser means are detained pending trial while wealthy defendants are released to self-funded private jails.” *United States v. Boustani*, 932 F.3d 79, 82 (2d Cir. 2019). This principle protects the Constitution’s guarantee of equal protection and ensures all defendants—poor, wealthy, and even the uber-wealthy—are treated the same under the law. The Defendants here seek to circumvent this basic tenet of justice and buy their way out of jail by hiring guards to watch them inside a luxury condo. The Court should deny the Defendants’ attempts to leverage their wealth to receive special treatment. As an initial matter, the law forbids it under the circumstances. Moreover, the Defendants’ proposed private security solution, an arrangement that literally puts the guards in the employ of the inmates, cannot satisfy the requirements of the Bail Reform Act.

For these reasons, and as described in the government’s prior submission and during argument before the Court, the Defendants should remain detained pending trial.

Alon Alexander, Oren Alexander and their brother and co-defendant, Tal Alexander, have joined a group of wealthy individuals charged with sex trafficking and similar offenses who have attempted to buy their way out of federal detention by funding their own private jails. Courts presented with these proposals have rejected them for what they are: efforts to use money and privilege to receive special treatment in the justice system. *See, e.g., United States v. Combs*, No. 24 Cr. 542 (AS), 2024 WL 4903741, at \*3 (S.D.N.Y. Nov. 27, 2024); *United States v. Maxwell*, 510 F. Supp. 3d 165, 177 (S.D.N.Y. 2020); *United States v. Epstein*, 425 F. Supp. 3d 306, 326 (S.D.N.Y. 2019); *United States v. Raniere*, No. 18 Cr. 204 (NGG), 2018 WL 3057702, at \*7 (E.D.N.Y. June 20, 2018); *United States v. Valerio*, 9 F. Supp. 3d 283, 296 (E.D.N.Y. 2014).<sup>1</sup> At least two flaws in those private jail proposals are similarly fatal to the Defendants’ proposal here: First, the Bail Reform Act, except in a very limited circumstance, forbids usings privately funded detention as a condition of bail. And second, by its very nature, private guards are a poor, ineffective substitute for actual pretrial detention of a defendant.

In *United States v. Boustani*, the Second Circuit directly confronted this issue and held that the Bail Reform Act permits the use of private guards to avoid pretrial detention only where the

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<sup>1</sup> Although *Boustani* and many of these district court cases relying on that decision are from the Second Circuit, they are directly relevant to the circumstances here. *See also United States v. Bothra*, No. 19-1953, 2019 WL 8883664, at \* 2 (6th Cir. Nov. 5, 2019) (describing *Boustani*’s reasoning as “persuasive”); *United States v. Rudolph*, 582 F. Supp. 3d 804, 817 (D. Colo. 2022) (“the Bail Reform Act does not permit a two-tiered bail system in which defendants of lesser means are detained pending trial while wealthy defendants are released to self-funded private jails”) (quoting *Boustani*); *United States v. Freitekh*, No. 20 Cr. 435, 2022 WL 1415666, at \*2 (W.D.N.C. May 4, 2022) (same). Moreover, any decision from this Court on pretrial detention, if appealed, would be heard in the Southern District of New York, where the indictment against the Defendants was returned and where *Boustani* is binding law.

defendant is detained on risk of flight premised on his wealth. “[A] defendant may be released on such a condition only where, *but for* his wealth, he would not have been detained.” *Boustani*, 932 F.3d 82 (emphasis in original). This, however, is the exception to the rule. Where, as here, there are additional factors that require detention—including other factors going to risk of flight—the use of private security guards is not permitted under the Bail Reform Act. *See id.* (“[I]f a similarly situated defendant of lesser means would be detained, a wealthy defendant cannot avoid detention by relying on his personal funds to pay for private detention.”); *see also Maxwell*, 510 F. Supp. 3d at 177 (“the Defendant’s argument that private security guards could ensure her appearance at future proceedings runs afoul of the Bail Reform Act” because the defendant “would be detained regardless of her wealth”). Circumstances beyond a defendant’s wealth that justify pretrial detention, and thus which cannot be mitigated legally through the use of private guards, include, “the seriousness of the charged offenses and the lengthy possible sentence [a defendant] would face if convicted”; the strength and nature of the evidence against the defendant; and a defendant’s “personal characteristics, including . . . ‘frequent international travel . . . and extensive ties to foreign countries without extradition.’” *Boustani*, 932 F.3d at 83; *see also* 18 U.S.C. § 3142(g).

One upshot of this is that private guards and private detention cannot be relied upon to mitigate the danger a defendant presents to specific individuals or the community or the danger that he will attempt to harass and intimidate witnesses or obstruct justice.<sup>2</sup> But even focusing on

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<sup>2</sup> The government continues to strongly believe that the Defendants present an extreme danger to the community and that private security would be inadequate to ensure the safety of the community. *See United States v. Agnello*, 101 F. Supp. 2d 108, 114 (E.D.N.Y. 2000) (rejecting home detention, with electronic monitoring, video surveillance, and 24-hour guard posted outside home, and other restrictions, and noting that “[t]hese measures, albeit elaborate, do not assure the safety of other persons and the community in a manner remotely commensurate to pretrial detention in a government facility”). However, because this Court focused on whether private security could ensure the Defendant’s appearance in court in its questions at the end of the

the risk of flight, as the district and circuit courts did in *Boustani*, this is a case where the non-wealth factors require the Defendants to be in-custody pending trial to reasonably assure their appearance in court. *See Boustani*, 932 F.3d at 83 (“It is clear that the District Court did not rely primarily on Boustani’s personal wealth in finding that he posed a flight risk. Rather, his wealth was one of many factors the Court considered.”); *see also United States v. Boustani*, 356 F. Supp. 3d 246, 256-58 (E.D.N.Y. 2019). As Judge Reid noted only three weeks ago when ordering the detention of the defendants’ brother and co-conspirator Tal Alexander, it is many factors working together—not only the Defendants’ financial resources—including “the strong weight of the evidence; the significant sentence the Defendant faces; and the nature and circumstances of the offense; and the personal characteristics of the Defendant,” that require pretrial detention based on risk of flight in this case. *United States v. Alexander*, No. 24 MJ 4544, Dkt. No. 24 at 3-4 (S.D. Fla. Dec 17, 2024) (hereinafter, “T. Alexander Det. Order”); *see also United States v. Alexander*, No. 24 MJ 4544, 2024 WL 5186469, at \* 2 (S.D. Fla. Dec. 20, 2024) (order denying motion to reopen detention hearing).

The same considerations that supported Judge Reid’s decision to detain the co-defendant are present here as well. In fact, most of the factors demonstrating that Alon and Oren Alexander are serious flight risks have little to do with their wealth. These include, *inter alia*, the nature of their crimes, the possible life sentences they face, the fifteen-year mandatory minimum sentences they face, the prospect of “both incarceration and reputational harm,” the strength of the evidence, including the “testimony of numerous victims and witnesses, electronic evidence, physical evidence, and documentary evidence,” the Defendants’ international contacts, and their frequent

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December 30, 2024 preliminary detention hearing, the government has focused this letter on risk of flight.

international travel. *See* T. Alexander Det. Order at 3-4. The Defendants’ wealth only exacerbates an already clear risk of flight.<sup>3</sup> And just as a defendant of lesser means in the same situation would be detained pending trial (including a defendant with foreign contacts and sufficient wealth to pay for travel but insufficient wealth to hire around-the-clock private guards until a trial concluded), so too must the Defendants be detained here.

Setting aside, however, the impropriety of a private security bail condition under the circumstances of this case, it is also clear that private security would be ineffective and insufficient to ensure the Defendants’ appearance in court as required for several reasons.

*First*, there is an inherent conflict of interest present when the prisoner is the one paying his own jailers. *See Epstein*, 425 F. Supp 3d at 326 (noting that there is a “conflict that is created by the salary the ‘trustees’ are earning from the Defendant and their purported role as independent monitors. (The same problem arises in relation to private 24/7 security guards.)”); *Boustani*, 356 F. Supp. 3d at 257 (“Guidepost employees would face a clear conflict of interest—private prison guards paid by an inmate.”); *United States v. Tajideen*, 17-CR-46, 2018 WL 1342475, at \*6 (D.D.C. Mar. 15, 2018) (“While the Court has no reason to believe that the individuals selected

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<sup>3</sup> The defendant’s reliance on *United States v. Napout*, No. 15 Cr. 250 (PKC) (E.D.N.Y.), which preceded the Second Circuit’s decision in *Boustani*, is misplaced. *See* Dkt. No. 8 at 8-9. The Defendants’ risks of flight are based on many factors that go beyond their wealth that were not present in *Napout*. Among other differences between the cases, *Napout* was a fraud and money laundering case where the defendant faced no mandatory minimum sentence and was unlikely to receive a sentence of multiple decades or longer. Here the Defendants face both a fifteen-year mandatory minimum and a likelihood of sentences of multiple times that length. Recent examples in the Southern and Eastern Districts of New York show that the Defendants, who are charged with sex trafficking, not fraud, are likely to receive sentences significantly longer than the 108 months to which *Napout* was ultimately sentenced. *See United States v. Raniere*, No. 18 Cr. 204 (NGG), Dkt. No. 969 (E.D.N.Y. Oct. 30, 2020) (120-year sentence); *United States v. Maxwell*, No. 20 Cr. 330 (AJN), Dkt. No. 696 (S.D.N.Y. June 29, 2022) (20-year sentence); *United States v. Ray*, 20 Cr. 110 (LJL), Dkt. No. 615 (S.D.N.Y. Jan. 31, 2023) (60-year sentence); *United States v. Paduch*, 23 Cr. 181 (RA), Dkt. No. 186 (S.D.N.Y. Nov. 21, 2024) (life sentence).



for the defendant's security detail would intentionally violate federal law and assist the defendant in fleeing the Court's jurisdiction, it nonetheless is mindful of the power of money and its potential to corrupt or undermine laudable objectives. And although these realities cannot control the Court's ruling, they also cannot be absolutely discounted or ignored."'). The conflict of interest is not only one of divided loyalty but also a financial one where a security guard's act of reporting violations of bail conditions would risk ending a lucrative contract for his employer and potentially his own salary. This creates a significant risk that a company and its employees would observe, if not outright assist, bail condition violations, without bringing them to the Court's attention. *See Boustani*, 356 F. Supp. 3d at 257 ("[T]he defendant in [*Seng* ], who was released to private armed guards from Guidepost in an arrangement similar to what defendant proposes here, was outside of his apartment virtually all day, every weekday; was visited by a masseuse for a total of 160 hours in a 30-day period; and went on an unauthorized visit to a restaurant in Chinatown with his private guards in tow."').

Here, the conflict is only exacerbated by the fact that Alon Alexander is a senior executive of a private security company that provides, among other things, armed security guards. As the head of the Defendants' chosen private security firm acknowledged during the hearing, everyone in the private security industry is familiar with Kent Security. Alon's background and experience as a private security executive, coupled with the fact that he will be paying the individuals responsible for ensuring his compliance with bail conditions, raises serious concerns that the individuals responsible for guarding Alon on a daily basis will not feel sufficiently empowered to stop or report him should he violate any conditions. The situation faced by Oren Alexander, the brother, son, and nephew of Kent Security executives, is much the same. The government is not attempting to impugn the integrity of the private security firm identified by the Defendants, but

the fact of the matter is that a private security company is just that—a private company. The government has no control or even insight into the hiring or training practices of any private security company and does not have a position of supervisory authority over it. *See Raniere*, 2018 WL 3057702, at \*7 (“The court in no way impugns the private security firm that Defendant has proposed. This firm appears to employ a number of experienced law-enforcement veterans, and it would surely have a strong reputational incentive to keep Defendant confined. The court nevertheless has general concerns about the use of a private security company to monitor a defendant’s home confinement, particularly where the company has been chosen by the defendant, where the Government ‘exercises no hiring, training, or supervisory control’ over it, and where the court knows nothing about the individuals who would be responsible for monitoring the defendant on a day-to-day basis.”).

*Second*, private security guards lack sufficient authority to truly ensure the Defendants’ appearance in court as required and to prevent their flight. Private security guards are not law enforcement officers. They are substantially more limited in their ability to stop or restrain a defendant determined to flee or otherwise violate his conditions. *See Valerio*, 9 F. Supp. 3d at 295 (“The questions about the legal authorization for the private security firm to use force against defendant should he violate the terms of his release, and the questions over whether the guards can or should be armed, underscore the legal and practical uncertainties—indeed, the imperfections—of the private jail-like concept envisioned by defendant, as compared to the more secure option of an actual jail.”); *Boustani*, 356 F. Supp. 3d at 258 (“Defendant’s private jail proposal raises several issues related to use of force. Although Defendant has consented to the use of ‘any’ force by Guidepost and has waived his right to sue any party in connection with the risks and dangers associated with escape attempts, it is not clear such an agreement is enforceable—and the defense

fails to point to precedent suggesting it would be. Defendant cannot consent to the use of deadly force.”). Moreover, the questions raised about the use of force go beyond the defendants’ ability to consent to the use of force, which the Court rightly questioned at the preliminary detention hearing, and implicate the safety of the community. *Ranieri*, 2018 WL 3057702, at \*7 (“[A]ny escape attempt would also present the risk of a confrontation between armed guards and Defendant (or his followers) in the streets of New York City, which would mean that any reduction in the Defendant’s flight risk from this proposal would be at least partially offset by a greater risk to the community.”). This concern is only exacerbated by the Defendant’s proposed location of confinement in or around Miami—nearly 1,200 miles from the courthouse where the Defendant will regularly appear in this case. The logistics required to transport the defendant, and for the transportation to happen safely and effectively, places an enormous, undue burden on the courts and federal and local law enforcement, who necessarily must coordinate, track and, potentially, recapture, the Defendants should they chose to flee at a rest stop or in a terminal while in transit. *See Valerio*, 9 F. Supp. 3d at 295 (“[T]he bail package and attempt to replicate a jail in defendant’s home would place a burden on the government not contemplated by the Bail Reform Act.”).

Courts in this district have also rejected the use of private security in lieu of federal detention as inadequate to mitigate risk of flight. As the district court held in *United States v. Botero*, 604 F. Supp. 1028 (S.D. Fla. 1985), *aff’d*, 853 F.2d 928 (11th Cir. 1988),

Similarly, the defendant’s proposal of a strict curfew and house arrest, even under twenty-four hour guard and an electronic tracking system is inadequate to reasonably assure this Court of Mr. Botero’s future appearance. It must be remembered that wherever Mr. Botero stays in the Miami area, he will be only minutes away from a private airfield. Thus, even a short delay in notifying the authorities would permit Mr. Botero to successfully flee. Mr. Botero need only wait for the appropriate time—when his guard was out of the room, asleep or had his attention elsewhere—to get the head start he would need. Moreover, it is not entirely clear what authority and what duty

a private guard would have to prevent Mr. Botero's flight. Certainly, this Court would be reluctant to hold such a guard in contempt if it appeared that he was unable to physically prevent Mr. Botero's flight.

*Botero*, 604 F. Supp. at 1035. All of the concerns that caused the *Botero* court to reject the proposal of private security are present in this case. The Defendants are proposing to be released to a property in the Miami area, where they not only are in close proximity to private airfields and waterways with direct access to the ocean, they also have a long track record of traveling by exactly those means on a regular basis. Each of the Defendants is easily able to arrange for a boat or private aircraft to facilitate his escape, wait for the right moment, and rely on the limits to a private security guard's authority in order to flee. These Defendants' personal characteristics also make them worse candidates for a private security bail condition than in *Botero*. In particular, as alleged in the Indictment, the Defendants, among other things, used surreptitious drugging and deceit to carry out their criminal conduct. And as this Court pointed out during the December 30, 2024 Preliminary Detention Hearing, Alon's significant experience with private security guards may better enable him to evade their restrictions. At bottom, the most private security will be able to do is reduce the Defendants' head starts—not prevent them from fleeing.

And critically, the inquiry here is not whether the Defendants' flight is likely to ultimately be successful nor whether the government can possibly someday extradite them back from a foreign country to face justice. It is whether the conditions are sufficient to *prevent them from attempting to flee in the first place*. And here, they clearly are not. As multiple courts have found, “[t]o the extent [armed private guards] implies an expectation that deadly force may need to be used to assure defendants’ presence at trial . . . [s]uch a conclusion would, in fact, demand a defendant’s detention.” *United States v. Sabhnani*, 493 F.3d 63, 74 n.13 (2d Cir. 2007); *see also United States v. Dermen*, 779 Fed. App’x (10th Cir. 2019) (“[I]f his risk of flight can be constrained

only by constant supervision by private security personnel that are willing to use physical force, the appropriate means to accomplish that is pretrial detention.”) (cleaned up).

At Alon’s December 30, 2024 preliminary detention hearing, the parties and the Court spent considerable time discussing issues including the ability of private security to use deadly force (or any force at all), and the possibility of the Defendants renting a 55th story apartment with no balcony and only one way in and one way out to ensure the Defendants’ appearance. The fact that it was necessary to seriously consider such measures in the first place demonstrates that the Defendants are serious flight risks and no condition or combination of conditions can ensure their appearance in court as required.

\* \* \*

Accordingly, the Court should reject the Defendants' requests for bail and detain them pending trial.

Respectfully submitted,

MARKENZY LAPOINTE  
UNITED STATES ATTORNEY

By: /s/ Lauren A. Astigarraga  
Lauren A. Astigarraga  
Assistant United States Attorney  
FL Bar No. 0119473  
99 N.E. 4<sup>th</sup> Street  
Miami, FL 33132  
Telephone (305) 961-9105  
Lauren.Astigarraga@usdoj.gov

EDWARD Y. KIM  
ACTING UNITED STATES ATTORNEY  
SOUTHERN DISTRICT OF NEW YORK

By: /s/  
Kaiya Arroyo  
Elizabeth A. Espinosa  
Andrew Jones  
Assistant United States Attorneys  
26 Federal Plaza, 37th Floor  
New York, NY 10278  
Telephone (212) 637-2249  
Andrew.Jones2@usdoj.gov

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**U.S. District Court**

**Southern District of Florida**

**Notice of Electronic Filing**

The following transaction was entered on 1/6/2025 at 9:25 AM EST and filed on 1/3/2025

**Case Name:** USA v. Alexander et al

**Case Number:** 1:24-mj-04616-EFD

**Filer:** Dft No. 2 – Oren Alexander

**Document Number:** 25(No document attached)

**Docket Text:**

**ORAL DEFENSE MOTION to reset Detention and Removal Hearing by Oren Alexander. (fbn)**

**1:24-mj-04616-EFD-2 Notice has been electronically mailed to:**

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Joel M. Denaro &nbsp; &nbsp; jdenaro@joeldenarolaw.com

Lauren Alexandra Astigarraga &nbsp; &nbsp; lauren.astigarraga@usdoj.gov, Andrea.Samper@usdoj.gov, CaseView.ECF@usdoj.gov, usafls-hqdk@usdoj.gov

Richard Carroll Klugh , Jr &nbsp; &nbsp; rickklu@aol.com, allison.bradley@uprfirm.com, klughlawoffice@gmail.com

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**U.S. District Court**

**Southern District of Florida**

**Notice of Electronic Filing**

The following transaction was entered on 1/6/2025 at 9:28 AM EST and filed on 1/3/2025

**Case Name:** USA v. Alexander et al

**Case Number:** 1:24-mj-04616-EFD

**Filer:**

**Document Number:** 26(No document attached)

**Docket Text:**

**PAPERLESS ORDER granting [25] Defense Motion to reset Pretrial Detention and Removal Hearing as to Oren Alexander (2). Pretrial Detention Hearing set for 1/7/2025 at 01:30 PM in the Miami Division before MIA Duty Magistrate Judge. Removal Hearing set for 1/7/2025 at 01:30 PM in the Miami Division before MIA Duty Magistrate Judge. Signed by Magistrate Judge Eduardo I. Sanchez (fbn)**

**1:24-mj-04616-EFD-2 Notice has been electronically mailed to:**

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Joel M. Denaro &nbsp; &nbsp; jdenaro@joeldenarolaw.com

Lauren Alexandra Astigarraga &nbsp; &nbsp; lauren.astigarraga@usdoj.gov, Andrea.Samper@usdoj.gov, CaseView.ECF@usdoj.gov, usafls-hqdk@usdoj.gov

Richard Carroll Klugh , Jr &nbsp; &nbsp; rickklu@aol.com, allison.bradley@uprfirm.com, klughlawoffice@gmail.com



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## COURT MINUTES

Page 6

## Magistrate Judge Eduardo I. Sanchez

Atkins Building Courthouse - 6th Floor

Date: 1/3/25

Time: 10:00 a.m.

Defendant: 2) Oren Alexander J#: 52667-511 Case #: 24-4616-MJ-D'ANGELO

AUSA: Elizabeth Espinosa, S/D-NY Attorney: Richard Klugh, Retained & Penny WilsonViolation: WARR\SD-NY\Consp to Commit Sex Trafficking; Sex Trafficking by Force, Fraud CoercionProceeding: Pretrial Detention and Removal Hearings

CJA Appt: \_\_\_\_\_

Bond/PTD Held: ☐ Yes ☐ No

Recommended Bond: \_\_\_\_\_

Bond Set at: \_\_\_\_\_

Co-signed by: \_\_\_\_\_

☐ Surrender and/or do not obtain passports/travel docs☐ Report to PTS as directed/or \_\_\_\_\_ x's a week/month by phone: \_\_\_\_\_ x's a week/month in person☐ Random urine testing by Pretrial Services \_\_\_\_\_  
Treatment as deemed necessary☐ Refrain from excessive use of alcohol☐ Participate in mental health assessment & treatment☐ Maintain or seek full-time employment/education☐ No contact with victims/witnesses☐ No firearms☐ Not to encumber property☐ May not visit transportation establishments☐ Home Confinement/Electronic Monitoring and/or  
Curfew \_\_\_\_\_ pm to \_\_\_\_\_ am, paid by \_\_\_\_\_☐ Allowances: Medical needs, court appearances, attorney visits,  
religious, employment☐ Travel extended to: \_\_\_\_\_☐ Other: \_\_\_\_\_Language: English

Disposition:

\*Brady Order NOT Given

Defense one knows Motion  
to reset Detention and  
Removal Hearing to 1/7/25  
is GrantedTime from today to \_\_\_\_\_ excluded  
from Speedy Trial Clock

NEXT COURT APPEARANCE

Date:

Time:

Judge:

Place:

Report RE Counsel: \_\_\_\_\_

PTD/Bond Hearing: \_\_\_\_\_

Prelim/Arraign or Removal: \_\_\_\_\_

Status Conference RE: \_\_\_\_\_

D.A.R. 11:07:22; 11:08:10

Time in Court: \_\_\_\_\_

16 minutes

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 24-MJ-4616

UNITED STATES OF AMERICA,

Miami, Florida

vs.

January 3, 2025

OREN ALEXANDER,

Defendant(s). Pages 1 - 18

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DETENTION AND REMOVAL HEARING  
TRANSCRIBED FROM DIGITAL AUDIO RECORDING  
BEFORE THE HONORABLE EDUARDO SANCHEZ  
UNITED STATES MAGISTRATE JUDGE

APPEARANCES:

FOR THE PLAINTIFF(S): ELIZABETH ESPINOSA  
KAIYA ARROYO  
United States Attorney's Office  
Southern District of New York  
New York, New York 10278

LAUREN ASTIGARAGGA  
United States Attorney's Office  
99 NE 4th Street  
Miami, FL 33132

FOR THE DEFENDANT(S): RICHARD KLUGH  
JENNIFER WILSON  
25 SE 2nd Avenue  
Suite 1100  
Miami, FL 33131

REPORTED BY: JILL M. WELLS, RMR, CRR, CSR  
Federal Official Court Reporter  
701 Clematis Street  
West Palm Beach, FL 33401  
jill\_wells@flsd.uscourts.gov

(Case called to order of the court.)

THE DEPUTY CLERK: Calling Oren Alexander.

Announce your appearances.

MS. ESPINOSA: Good morning, your Honor.

Elizabeth Espinosa, Kaiya Arroyo, and Lauren  
Astigarraga, for the government.

MR. KLUGH: Good morning, your Honor.

Richard Klugh and Jenny Wilson, for the defendant in  
this case.

THE COURT: Good morning, Mr. Klugh. Good morning  
Ms. Wilson. And good morning, Mr. Alexander.

MR. KLUGH: Your Honor, we are here for a removal  
hearing, I believe, first, since the court was just dealing  
with that, and we are ready to proceed.

THE COURT: The removal part of it?

MR. KLUGH: Yes, we are.

THE COURT: Okay.

MR. KLUGH: Can we sit down, your Honor?

THE COURT: Sure.

MS. ESPINOSA: Your Honor, again, the issue for a  
removal hearing --

THE COURT: Give me just a moment.

I'm sorry, Ms. Espinosa.

MS. ESPINOSA: Again, your Honor, the issue for a  
removal hearing is just did we arrest the correct person, and

1 here we did.

2 Just as with his brother, Oren Alexander was arrested  
3 in his own --

4 MR. KLUGH: Objection. Judge, we are not allowed to  
5 proceed by proffer at a removal hearing.

6 THE COURT: Ms. Espinosa, I think you do have to  
7 present evidence.

8 MS. ESPINOSA: Okay. Give me one moment, your Honor.

9 THE COURT: Okay. Thank you.

10 MS. ESPINOSA: Your Honor, at the last hearing we  
11 asked if we could proceed by proffer on this, and there was no  
12 objection.

13 Additionally, when we moved to -- we did not --

14 MR. KLUGH: Your Honor, we object. We were not  
15 present at the last hearing. We are not a party to the last  
16 hearing. We object.

17 Again, this attribution, which has occurred throughout  
18 this case, that if they say something about one brother, the  
19 other brother's due process rights are denied.

20 MS. ESPINOSA: Your Honor, when counsel contacted us  
21 and asked for an adjournment, a continuance of the hearing as  
22 to Mr. Oren Alexander, we agreed on the condition that we would  
23 not be making another government witness available for the  
24 second hearing.

25 We do not have a witness available from the Southern

1 District of New York because we operated in a good faith  
2 understanding that, as defense counsel agreed, they would not  
3 be expecting one here. So we are not in a position to put on a  
4 witness at this time.

5 MR. KLUGH: The agreement was, and if the  
6 government -- we are trying to be reasonable here. The  
7 government needs to have a witness.

8 We are perfectly prepared to have the matter carried  
9 over until next week to the next mag court. There are  
10 additional reasons for that to occur in this case, your Honor.

11 As the court was aware, I was going through severe eye  
12 problems. I did go through the surgical procedure yesterday.  
13 As a result of that, and including the holidays, it has been  
14 difficult for me to confer fully with Mr. Oren Alexander.

15 If the government wants to have an opportunity to  
16 bring a witness in for the removal hearing, which we never  
17 stipulated anything to at any time, we do not object if they  
18 want to push it over until next week.

19 MS. ESPINOSA: Your Honor, as the court is aware, at  
20 the conclusion of the hearing, it was actually Mr. Klugh who  
21 was present.

22 The court -- we inquired, so we could lay for the  
23 actual record, we inquired whether or not the government would  
24 be required to bring an additional witness for the purposes of  
25 evidence. We were addressing it on this very point.

1 Mr. Klugh said that that was previously the agreement,  
2 that we weren't required to bring an additional witness.

3 However, to the extent that they are now asking for an  
4 identity hearing, then we would ask that this be reset for next  
5 week for the purposes of establishing that the person who is  
6 sitting at defense counsel table is the person who is named in  
7 the indictment.

8 THE COURT: Okay. I will say, it seems to me this was  
9 probably a miscommunication. I understand as the government  
10 understands it, and I understand, Mr. Klugh, that you saw it  
11 differently.

12 I will tell you, I thought the defense was not  
13 requiring the government to present any witnesses today. But  
14 having said that, I don't know that that is, in fact, what you  
15 said.

16 So I understand where you are, but I think that going  
17 forward under the circumstances where the government thought  
18 that there was an agreement, and since you are asking for more  
19 time anyway, I think that is appropriate. So we can reset this  
20 to next week for the removal hearing.

21 MS. ESPINOSA: Your Honor, could we go forward with  
22 the detention hearing today?

23 MR. KLUGH: Your Honor, my understanding would be to  
24 carry it over to next week. We are prepared to resolve  
25 detention today. The (inaudible) matters are for mag court

1 next week, if that's all right.

2 THE COURT: And you are not prepared to resolve -- to  
3 address the detention hearing today?

4 MR. KLUGH: Let me just -- to make sure.

5 MS. ESPINOSA: And I believe your Honor was clear that  
6 the evidence was closed as it related to detention. That's why  
7 we don't have an FBI agent who is present here.

8 So we could ask that we proceed just with argument as  
9 it relates to detention.

10 MR. KLUGH: Your Honor, for the reasons that I stated,  
11 which, again, I apologize for. I have had very severe problems  
12 with my eyes. I had an unexpected reaction to some things. I  
13 thought it was an infection. It turned out to be something  
14 called proptosis.

15 It's made it very difficult. I am establishing a  
16 relationship with a client that I did not know before. I would  
17 ask that the whole matter be continued to next week, and given  
18 the holiday situation we went through, and everything else.

19 THE COURT: I understand that the government would  
20 like to resolve this today, but given Mr. Klugh's health  
21 conditions and his inability to do this, I take him at his word  
22 that he needs more time, and I understand that this is not a  
23 matter of --

24 Mr. Klugh, I think that it should be clear on the  
25 record that the evidence has closed on this, and I think that



1 was your agreement as to the detention.

2 MR. KLUGH: The government's evidence is closed, your  
3 Honor. The government's evidence. That's my understanding,  
4 unless I am mistaken.

5 Our agreement was that they did not have to call an  
6 agent for the detention hearing. We stand by that agreement.

7 MS. ESPINOSA: Your Honor, I am also -- we were  
8 prepared to go forward as to the detention for Oren Alexander  
9 today, and defense counsel at no point told us that he needed  
10 more time for the detention portion.

11 We have been traveling back and forth, your Honor,  
12 because, as you know, this is an out-of-district case for us.  
13 So defense counsel could have reached out to us and said he  
14 needed more time on detention. He didn't. We are prepared to  
15 go forward today.

16 Nothing changes materially as to detention. So while  
17 we are willing to put the removal matter over, we see no reason  
18 to adjourn the detention portion today.

19 MR. KLUGH: Your Honor, just for efficiency sake, have  
20 the matters held together, I would urge the court, and for the  
21 reason I said. These are not made-up reasons. It's  
22 unfortunate.

23 My spouse is here, Jacqueline Shapiro. She can vouch  
24 for my problems. It's been very difficult. I'd ask the court  
25 just for the defendant's benefit. He has not had the same

1 benefit that --

2 THE COURT: Ms. Espinosa, I understand what you are  
3 saying. I know it's a horrible inconvenience.

4 Look. If counsel's health issues have just prevented  
5 him from being able to proceed today in the manner that he  
6 thinks he should, I just don't think that's an issue that we  
7 want, and I don't think it's an issue that you want going  
8 forward, either.

9 I think we want to make sure that the defendant has  
10 his counsel available and fully able to respond and make the  
11 presentation that's required, and not have some argument later  
12 that they were forced to proceed without counsel who was in a  
13 position, because of health issues, to render effective  
14 assistance.

15 MS. ESPINOSA: Understood, your Honor. And I would  
16 just ask that going forward, if there are any additional  
17 issues, or he anticipates any future issues, that he would --  
18 to let us know, as we are traveling and we will need to make  
19 arrangements. So we would greatly appreciate it if we could  
20 get some advance notice of any further challenges.

21 We also ask your Honor, if it's possible, to continue  
22 before your Honor, as you are familiar with all of the facts.  
23 You witnessed the evidence in this case that will be used to  
24 apply to Mr. Oren Alexander.

25 MR. KLUGH: Your Honor, my understanding is that's not

1 the way it works. That's just my understanding. I don't think  
2 the government is entitled to special treatment. Apparently,  
3 they are happy with resolution of something and they want to  
4 stay with this.

5 MS. ESPINOSA: Your Honor, respectfully, that's  
6 incorrect. Whenever there is a continuation of a detention  
7 hearing, just as what happened this week, we continued before  
8 your Honor. Your Honor received all of the government's  
9 evidence in this case.

10 So, as a result, to kick it over to a different  
11 magistrate judge, who has not heard the presentation of  
12 evidence, would be inefficient.

13 So we would ask that the government has the benefit,  
14 because it will now be the third time the government is  
15 required to present information, that it be heard before this  
16 court.

17 MR. KLUGH: Under that theory, we should have been in  
18 front of Judge Reid. This simply does not add up. We didn't  
19 start our detention hearing.

20 It's not a continuation of a detention hearing that  
21 started. It's simply a motion, as part of the other motion to  
22 continue, to keep the things together and treat this like a  
23 regular case, which I think the court has indicated it's trying  
24 to do.

25 MS. ASTIGARRAGA: The point of the government's

1 proffer, Judge, in terms of how it was prepared, was to address  
2 the two outstanding defendants who the question on detention or  
3 bond remains pending. And so in this case that is exactly what  
4 the government did.

5 Ms. Espinosa flew down again here on Friday for the  
6 purpose -- we set, in fact, the continuation of Mr. Alon  
7 Alexander's hearing to be set on Friday because we thought we  
8 were proceeding on Oren.

9 So now we are asking for the court to consider the  
10 remainder of the evidence that it first considered as it  
11 related to this particular issue.

12 THE COURT: I understand the circumstances. I am --  
13 let me ask you first.

14 In terms of days, when is it that the parties would be  
15 ready to proceed?

16 When will you be ready to proceed, Mr. Klugh? And I  
17 will determine it later.

18 I am not sure that this shouldn't go to -- because  
19 given that we haven't -- I think it's going to be the same  
20 evidence. The same record is what will, should be -- even if  
21 it goes to Judge Torres -- will be the same proffer, that there  
22 would be no reopening of evidence other than argument and  
23 conditions that would be proffered, things along those lines, I  
24 think, as that was not done as to this defendant individually.

25 MR. KLUGH: They have already indicated they want to

1 introduce the record from the Judge Reid case, and these are  
2 things they are introducing from two cases. I don't see any  
3 difference.

4 But, again, it's a matter of -- I am not -- I just  
5 think that's the appropriate way to proceed in this matter, is  
6 to carry it over to mag court.

7 I would try to be ready for Monday. You know, we can  
8 try. I am not trying to delay it. If that's convenient.  
9 Whatever is convenient for the government in terms of next  
10 week.

11 But I just want to say, the notion that this is a  
12 continuation of a detention hearing in order to, you know, find  
13 a forum you want to be in, that's incorrect.

14 THE COURT: I understand, Mr. Klugh, but there were --  
15 this was initially set for Monday, and it was moved to Friday  
16 on your motion. I moved it because of the health reasons, and  
17 I think that was appropriate.

18 You did represent that there would be -- that you were  
19 ready to proceed on the evidence that the government would  
20 present at that hearing.

21 I am concerned that you would not be ready -- do you  
22 believe that there are reasons that you would not be ready on  
23 Monday, as well?

24 MR. KLUGH: I stop my antibiotics this time on  
25 Saturday night. So I think I will be fine for Monday mag

1 court, or Tuesday mag court, whatever the government wants, for  
2 next week.

3 THE COURT: Let me ask you, Ms. Espinosa.

4 When next week?

5 MS. ESPINOSA: Your Honor, I think we can be available  
6 when the court is available. I think we may want the  
7 transcript of today's proceeding, which I think would be easier  
8 to get by Tuesday than by Monday. But if the court is  
9 available a particular day, we will make that work.

10 THE COURT: Okay.

11 Does Tuesday work, Mr. Klugh? Is that something that  
12 the defense is willing to do?

13 I also want to make -- I am concerned that over the  
14 weekend something happens, and we are back here Monday and you  
15 need another day.

16 MR. KLUGH: Tuesday would work.

17 THE COURT: Okay. So I am going to reset this for  
18 Tuesday for detention and removal hearing. And I will let you  
19 know later today -- I want to think about whether it's  
20 something that should stay before me, or whether it's something  
21 that appropriately moves on to the duty judge.

22 So I will enter an order to that effect later today  
23 and let you know when it's scheduled. It will either be before  
24 me Tuesday in the morning, or if it's in front of Judge Torres,  
25 it will be at 1:30 since he has one calendar.

1 MS. ESPINOSA: Thank you, your Honor.

2 MR. KLUGH: I appreciate it very much, the  
3 consideration.

4 THE COURT: Okay.

5 MR. SREBNICK: If I could address the court on behalf  
6 of Alon Alexander in terms of the removal.

7 I'd ask the court to enter a stay of the removal until  
8 at least the end of business on Tuesday so that if we are going  
9 to file an appeal to the judge in New York on the issue of  
10 bond, he is not in transit.

11 In any event, Alon Alexander is not going to be moved  
12 because he has a hearing on Tuesday. So I'd ask for a stay  
13 until the close of business on Tuesday, and we revisit the  
14 issue then.

15 MS. ASTIGARRAGA: The government takes no position at  
16 this time.

17 THE COURT: No position, okay. Then I will -- with  
18 the government not objecting, taking no position, I will grant  
19 your stay until Tuesday.

20 MR. SREBNICK: Through the end of business on Tuesday,  
21 Judge?

22 THE COURT: Through Tuesday.

23 MR. SREBNICK: Through Tuesday. Thank you.

24 THE COURT: Is there anything else that we need to  
25 address?

MS. ESPINOSA: Not from the government, your Honor.

THE COURT: Okay, thank you.

(Proceedings adjourned.)

C E R T I F I C A T E

I hereby certify that the foregoing is an accurate transcription to the best of my ability of the digital audio recording in the above-entitled matter.

January 4, 2025                    /s/ Jill M. Wells  
Jill M. Wells, RMR, CRR, CSR  
Federal Official Court Reporter  
701 Clematis Street  
West Palm Beach, FL 33401  
jill\_wells@flsd.uscourts.gov



<p><b>MR. KLUGH:</b> [18]  <b>MR. SREBNICK:</b> [3] 13/5 13/20 13/23  <b>MS. ASTIGARRAGA:</b> [2] 9/25 13/15  <b>MS. ESPINOSA:</b> [15]  <b>THE COURT:</b> [21]  <b>THE DEPUTY CLERK:</b> [1] 2/2</p> <hr/> <p>/</p> <hr/> <p>/s [1] 14/11</p> <hr/> <p><b>1</b></p> <hr/> <p><b>10278</b> [1] 1/14  <b>1100</b> [1] 1/19  <b>18</b> [1] 1/7  <b>1:30 since</b> [1] 12/25</p> <hr/> <p><b>2</b></p> <hr/> <p><b>2025</b> [2] 1/5 14/11  <b>24-MJ-4616</b> [1] 1/2  <b>25</b> [1] 1/19  <b>2nd</b> [1] 1/19</p> <hr/> <p><b>3</b></p> <hr/> <p><b>33131</b> [1] 1/20  <b>33132</b> [1] 1/17  <b>33401</b> [2] 1/22 14/13</p> <hr/> <p><b>4</b></p> <hr/> <p><b>4616</b> [1] 1/2  <b>4th</b> [1] 1/16</p> <hr/> <p><b>7</b></p> <hr/> <p><b>701</b> [2] 1/22 14/12</p> <hr/> <p><b>9</b></p> <hr/> <p><b>99</b> [1] 1/16</p> <hr/> <p><b>A</b></p> <hr/> <p><b>ability</b> [1] 14/8  <b>able</b> [2] 8/5 8/10  <b>about</b> [2] 3/18 12/19  <b>above</b> [1] 14/9  <b>above-entitled</b> [1] 14/9  <b>accurate</b> [1] 14/7  <b>actual</b> [1] 4/23  <b>actually</b> [1] 4/20  <b>add</b> [1] 9/18  <b>additional</b> [4] 4/10 4/24 5/2 8/16  <b>Additionally</b> [1] 3/13  <b>address</b> [4] 6/3 10/1 13/5 13/25  <b>addressing</b> [1] 4/25  <b>adjourn</b> [1] 7/18  <b>adjourned</b> [1] 14/3  <b>adjournment</b> [1] 3/21  <b>advance</b> [1] 8/20  <b>again</b> [6] 2/20 2/24 3/17 6/11 10/5 11/4  <b>agent</b> [2] 6/7 7/6  <b>agreed</b> [2] 3/22 4/2  <b>agreement</b> [6] 4/5 5/1 5/18 7/1 7/5 7/6  <b>ALEXANDER</b> [10] 1/6 2/2 2/11 3/2 3/22  4/14 7/8 8/24 13/6 13/11  <b>Alexander's</b> [1] 10/7  <b>all</b> [3] 6/1 8/22 9/8  <b>allowed</b> [1] 3/4  <b>Alon</b> [3] 10/6 13/6 13/11</p>	<p>along [1] 10/25  <b>already</b> [1] 10/25  <b>also</b> [3] 7/7 8/21 12/13  <b>am</b> [10] 6/15 7/4 7/7 10/12 10/18 11/4  11/8 11/21 12/13 12/17  <b>AMERICA</b> [1] 1/3  <b>Announce</b> [1] 2/3  <b>another</b> [2] 3/23 12/15  <b>antibiotics</b> [1] 11/24  <b>anticipates</b> [1] 8/17  <b>any</b> [7] 4/17 5/13 8/16 8/17 8/20 11/2  13/11  <b>anything</b> [2] 4/17 13/24  <b>anyway</b> [1] 5/19  <b>apologize</b> [1] 6/11  <b>Apparently</b> [1] 9/2  <b>appeal</b> [1] 13/9  <b>appearances</b> [2] 1/11 2/3  <b>apply</b> [1] 8/24  <b>appreciate</b> [2] 8/19 13/2  <b>appropriate</b> [3] 5/19 11/5 11/17  <b>appropriately</b> [1] 12/21  <b>are</b> [30]  <b>argument</b> [3] 6/8 8/11 10/22  <b>arrangements</b> [1] 8/19  <b>arrest</b> [1] 2/25  <b>arrested</b> [1] 3/2  <b>ARROYO</b> [2] 1/13 2/5  <b>as</b> [22]  <b>ask</b> [11] 5/4 6/8 6/17 7/24 8/16 8/21  9/13 10/13 12/3 13/7 13/12  <b>asked</b> [2] 3/11 3/21  <b>asking</b> [3] 5/3 5/18 10/9  <b>assistance</b> [1] 8/14  <b>ASTIGARRAGA</b> [1] 1/15  <b>Astigarraga</b> [1] 2/6  <b>Attorney's</b> [2] 1/13 1/16  <b>attribution</b> [1] 3/17  <b>audio</b> [2] 1/9 14/8  <b>available</b> [6] 3/23 3/25 8/10 12/5 12/6  12/9  <b>Avenue</b> [1] 1/19  <b>aware</b> [2] 4/11 4/19</p> <hr/> <p><b>B</b></p> <hr/> <p><b>back</b> [2] 7/11 12/14  <b>be</b> [32]  <b>Beach</b> [2] 1/22 14/13  <b>because</b> [8] 4/1 7/12 8/13 9/14 10/7  10/18 11/16 13/12  <b>been</b> [4] 4/13 7/11 7/24 9/17  <b>before</b> [7] 1/10 6/16 8/22 9/7 9/15 12/20  12/23  <b>behalf</b> [1] 13/5  <b>being</b> [1] 8/5  <b>believe</b> [3] 2/13 6/5 11/22  <b>benefit</b> [3] 7/25 8/1 9/13  <b>best</b> [1] 14/8  <b>bond</b> [2] 10/3 13/10  <b>bring</b> [3] 4/16 4/24 5/2  <b>brother</b> [2] 3/2 3/18  <b>brother's</b> [1] 3/19  <b>business</b> [3] 13/8 13/13 13/20</p> <hr/> <p><b>C</b></p> <hr/> <p><b>calendar</b> [1] 12/25</p>	<p>call [1] 9/5  <b>called</b> [2] 2/1 6/14  <b>Calling</b> [1] 2/2  <b>can</b> [5] 2/18 5/19 7/23 11/7 12/5  <b>carried</b> [1] 4/8  <b>carry</b> [2] 5/24 11/6  <b>case</b> [11] 1/2 2/1 2/9 3/18 4/10 7/12  8/23 9/9 9/23 10/3 11/1  <b>cases</b> [1] 11/2  <b>certify</b> [1] 14/7  <b>challenges</b> [1] 8/20  <b>changes</b> [1] 7/16  <b>circumstances</b> [2] 5/17 10/12  <b>clear</b> [2] 6/5 6/24  <b>Clematis</b> [2] 1/22 14/12  <b>client</b> [1] 6/16  <b>close</b> [1] 13/13  <b>closed</b> [3] 6/6 6/25 7/2  <b>concerned</b> [2] 11/21 12/13  <b>conclusion</b> [1] 4/20  <b>condition</b> [1] 3/22  <b>conditions</b> [2] 6/21 10/23  <b>confer</b> [1] 4/14  <b>consider</b> [1] 10/9  <b>consideration</b> [1] 13/3  <b>considered</b> [1] 10/10  <b>contacted</b> [1] 3/20  <b>continuance</b> [1] 3/21  <b>continuation</b> [4] 9/6 9/20 10/6 11/12  <b>continue</b> [2] 8/21 9/22  <b>continued</b> [2] 6/17 9/7  <b>convenient</b> [2] 11/8 11/9  <b>correct</b> [1] 2/25  <b>could</b> [7] 3/11 4/22 5/21 6/8 7/13 8/19  13/5  <b>counsel</b> [7] 3/20 4/2 5/6 7/9 7/13 8/10  8/12  <b>counsel's</b> [1] 8/4  <b>court</b> [22]  <b>CRR</b> [2] 1/21 14/11  <b>CSR</b> [2] 1/21 14/11</p> <hr/> <p><b>D</b></p> <hr/> <p><b>day</b> [2] 12/9 12/15  <b>days</b> [1] 10/14  <b>dealing</b> [1] 2/13  <b>defendant</b> [5] 1/7 1/18 2/8 8/9 10/24  <b>defendant's</b> [1] 7/25  <b>defendants</b> [1] 10/2  <b>defense</b> [6] 4/2 5/6 5/12 7/9 7/13 12/12  <b>delay</b> [1] 11/8  <b>denied</b> [1] 3/19  <b>detention</b> [19]  <b>determine</b> [1] 10/17  <b>did</b> [8] 2/25 3/1 3/13 4/12 6/16 7/5 10/4  11/18  <b>didn't</b> [2] 7/14 9/18  <b>difference</b> [1] 11/3  <b>different</b> [1] 9/10  <b>differently</b> [1] 5/11  <b>difficult</b> [3] 4/14 6/15 7/24  <b>digital</b> [2] 1/9 14/8  <b>district</b> [5] 1/1 1/1 1/14 4/1 7/12  <b>do</b> [7] 3/6 3/25 4/17 6/21 9/24 11/21  12/12  <b>does</b> [2] 9/18 12/11</p>
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<p><b>D</b></p> <p>don't [6] 5/14 6/7 8/6 8/7 9/1 11/2  done [1] 10/24  down [2] 2/18 10/5  due [1] 3/19  duty [1] 12/21</p>	<p><b>good [6]</b> 2/4 2/7 2/10 2/10 2/11 4/1  <b>government [20]</b>  <b>government's [4]</b> 7/2 7/3 9/8 9/25  <b>grant [1]</b> 13/18  <b>greatly [1]</b> 8/19</p>	<p><b>Jenny [1]</b> 2/8  <b>jill [5]</b> 1/21 1/23 14/11 14/11 14/13  <b>judge [11]</b> 1/10 3/4 9/11 9/18 10/1  10/21 11/1 12/21 12/24 13/9 13/21  <b>just [15]</b></p>
<p><b>E</b></p> <p>easier [1] 12/7  <b>EDUARDO [1]</b> 1/10  effect [1] 12/22  effective [1] 8/13  efficiency [1] 7/19  either [2] 8/8 12/23  <b>ELIZABETH [2]</b> 1/12 2/5  else [2] 6/18 13/24  end [2] 13/8 13/20  enter [2] 12/22 13/7  entitled [2] 9/2 14/9  <b>ESPINOSA [7]</b> 1/12 2/5 2/23 3/6 8/2  10/5 12/3  establishing [2] 5/5 6/15  even [1] 10/20  event [1] 13/11  everything [1] 6/18  evidence [13] 3/7 4/25 6/6 6/25 7/2 7/3  8/23 9/9 9/12 10/10 10/20 10/22 11/19  exactly [1] 10/3  expecting [1] 4/3  extent [1] 5/3  eye [1] 4/11  eyes [1] 6/12</p>	<p><b>H</b></p> <p>had [3] 6/11 6/12 7/25  happened [1] 9/7  happens [1] 12/14  happy [1] 9/3  has [10] 3/17 4/13 6/25 7/25 8/9 9/11  9/13 9/23 12/25 13/12  have [15]  haven't [1] 10/19  having [1] 5/14  he [12] 6/22 7/9 7/13 7/14 7/25 8/5 8/6  8/17 8/17 12/25 13/10 13/12  health [4] 6/20 8/4 8/13 11/16  heard [2] 9/11 9/15  hearing [25]  held [1] 7/20  here [8] 2/12 3/1 4/3 4/6 6/7 7/23 10/5  12/14  hereby [1] 14/7  him [2] 6/21 8/5  his [5] 3/2 3/3 6/21 6/21 8/10  holiday [1] 6/18  holidays [1] 4/13  Honor [30]  <b>HONORABLE [1]</b> 1/10  horrible [1] 8/3  how [1] 10/1  However [1] 5/3</p>	<p><b>K</b></p> <p><b>KAIYA [2]</b> 1/13 2/5  keep [1] 9/22  kick [1] 9/10  <b>KLUGH [10]</b> 1/18 2/8 2/10 4/20 5/1 5/10  6/24 10/16 11/14 12/11  <b>Klugh's [1]</b> 6/20  <b>know [9]</b> 5/14 6/16 7/12 8/3 8/18 11/7  11/12 12/19 12/23</p>
<p><b>F</b></p> <p>fact [2] 5/14 10/6  facts [1] 8/22  faith [1] 4/1  familiar [1] 8/22  <b>FBI [1]</b> 6/7  <b>Federal [2]</b> 1/21 14/12  file [1] 13/9  find [1] 11/12  fine [1] 11/25  first [3] 2/13 10/10 10/13  <b>FL [4]</b> 1/17 1/20 1/22 14/13  flew [1] 10/5  <b>FLORIDA [2]</b> 1/1 1/4  flsd.uscourts.gov [2] 1/23 14/13  forced [1] 8/12  foregoing [1] 14/7  forth [1] 7/11  forum [1] 11/13  forward [6] 5/17 5/21 7/8 7/15 8/8 8/16  <b>Friday [3]</b> 10/5 10/7 11/15  front [2] 9/18 12/24  fully [2] 4/14 8/10  further [1] 8/20  future [1] 8/17</p>	<p><b>I</b></p> <p>I'd [3] 7/24 13/7 13/12  I'm [1] 2/23  identity [1] 5/4  inability [1] 6/21  inaudible [1] 5/25  including [1] 4/13  inconvenience [1] 8/3  incorrect [2] 9/6 11/13  indicated [2] 9/23 10/25  indictment [1] 5/7  individually [1] 10/24  inefficient [1] 9/12  infection [1] 6/13  information [1] 9/15  initially [1] 11/15  inquired [2] 4/22 4/23  introduce [1] 11/1  introducing [1] 11/2  is [30]  issue [7] 2/20 2/24 8/6 8/7 10/11 13/9  13/14  issues [4] 8/4 8/13 8/17 8/17  it [33]  it's [15]</p>	<p><b>L</b></p> <p>last [3] 3/10 3/15 3/15  later [4] 8/11 10/17 12/19 12/22  <b>LAUREN [2]</b> 1/15 2/5  lay [1] 4/22  least [1] 13/8  let [6] 6/4 8/18 10/13 12/3 12/18 12/23  like [2] 6/20 9/22  lines [1] 10/23  Look [1] 8/4</p> <p><b>M</b></p> <p>made [2] 6/15 7/21  made-up [1] 7/21  mag [5] 4/9 5/25 11/6 11/25 12/1  magistrate [2] 1/10 9/11  make [6] 6/4 8/9 8/10 8/18 12/9 12/13  making [1] 3/23  manner [1] 8/5  materially [1] 7/16  matter [7] 4/8 6/17 6/23 7/17 11/4 11/5  14/9  matters [2] 5/25 7/20  may [1] 12/6  me [9] 2/22 3/8 4/14 5/8 6/4 10/13 12/3  12/20 12/24  <b>Miami [3]</b> 1/4 1/17 1/20  miscommunication [1] 5/9  mistaken [1] 7/4  <b>MJ [1]</b> 1/2  moment [2] 2/22 3/8  <b>Monday [6]</b> 11/7 11/15 11/23 11/25  12/8 12/14  more [4] 5/18 6/22 7/10 7/14  <b>morning [6]</b> 2/4 2/7 2/10 2/10 2/11  12/24  motion [3] 9/21 9/21 11/16  moved [4] 3/13 11/15 11/16 13/11  moves [1] 12/21  <b>Mr [1]</b> 12/11  <b>Mr. [13]</b> 2/10 2/11 3/22 4/14 4/20 5/1  5/10 6/20 6/24 8/24 10/6 10/16 11/14  <b>Mr. Alexander [1]</b> 2/11  <b>Mr. Alon [1]</b> 10/6  <b>Mr. Klugh [7]</b> 2/10 4/20 5/1 5/10 6/24  10/16 11/14  <b>Mr. Klugh's [1]</b> 6/20  <b>Mr. Oren [3]</b> 3/22 4/14 8/24  <b>Ms. [6]</b> 2/11 2/23 3/6 8/2 10/5 12/3  <b>Ms. Espinosa [5]</b> 2/23 3/6 8/2 10/5 12/3</p>
<p><b>G</b></p> <p>get [2] 8/20 12/8  Give [2] 2/22 3/8  given [3] 6/17 6/20 10/19  go [5] 4/12 5/21 7/8 7/15 10/18  goes [1] 10/21  going [8] 4/11 5/16 8/7 8/16 10/19</p>	<p><b>J</b></p> <p><b>Jacqueline [1]</b> 7/23  <b>January [2]</b> 1/5 14/11  <b>JENNIFER [1]</b> 1/18</p>	

<p><b>M</b></p> <p>Ms. Wilson [1] 2/11 much [1] 13/2 my [9] 5/23 6/12 7/3 7/23 7/24 8/25 9/1 11/24 14/8</p> <p><b>N</b></p> <p>named [1] 5/6 NE [1] 1/16 need [3] 8/18 12/15 13/24 needed [2] 7/9 7/14 needs [2] 4/7 6/22 never [1] 4/16 New [5] 1/14 1/14 1/14 4/1 13/9 New York [2] 4/1 13/9 next [11] 4/9 4/9 4/18 5/4 5/20 5/24 6/1 6/17 11/9 12/2 12/4 night [1] 11/25 no [8] 1/2 3/11 7/9 7/17 10/22 13/15 13/17 13/18 not [32] Nothing [1] 7/16 notice [1] 8/20 notion [1] 11/11 now [3] 5/3 9/14 10/9</p> <p><b>O</b></p> <p>object [3] 3/14 3/16 4/17 objecting [1] 13/18 objection [2] 3/4 3/12 occur [1] 4/10 occurred [1] 3/17 Office [2] 1/13 1/16 Official [2] 1/21 14/12 okay [9] 2/17 3/8 3/9 5/8 12/10 12/17 13/4 13/17 14/2 one [4] 3/8 3/18 4/3 12/25 operated [1] 4/1 opportunity [1] 4/15 order [3] 2/1 11/12 12/22 OREN [8] 1/6 2/2 3/2 3/22 4/14 7/8 8/24 10/8 other [3] 3/19 9/21 10/22 our [2] 7/5 9/19 out [3] 6/13 7/12 7/13 outstanding [1] 10/2 over [7] 4/9 4/18 5/24 7/17 9/10 11/6 12/13 own [1] 3/3</p> <p><b>P</b></p> <p>Pages [1] 1/7 Palm [2] 1/22 14/13 part [2] 2/15 9/21 particular [2] 10/11 12/9 parties [1] 10/14 party [1] 3/15 pending [1] 10/3 perfectly [1] 4/8 person [3] 2/25 5/5 5/6 PLAINTIFF [1] 1/12 point [3] 4/25 7/9 9/25 portion [2] 7/10 7/18 position [5] 4/3 8/13 13/15 13/17 13/18 possible [1] 8/21 prepared [6] 4/8 5/24 6/2 7/8 7/14 10/1</p>	<p>present [7] 5/7 5/15 4/21 5/15 6/7 9/15 11/20 presentation [2] 8/11 9/11 prevented [1] 8/4 previously [1] 5/1 probably [1] 5/9 problems [3] 4/12 6/11 7/24 procedure [1] 4/12 proceed [10] 2/14 3/5 3/11 6/8 8/5 8/12 10/15 10/16 11/5 11/19 proceeding [2] 10/8 12/7 Proceedings [1] 14/3 process [1] 3/19 proffer [4] 3/5 3/11 10/1 10/21 proffered [1] 10/23 proptosis [1] 6/14 purpose [1] 10/6 purposes [2] 4/24 5/5 push [1] 4/18 put [2] 4/3 7/17</p> <p><b>Q</b></p> <p>question [1] 10/2</p> <p><b>R</b></p> <p>reached [1] 7/13 reaction [1] 6/12 ready [7] 2/14 10/15 10/16 11/7 11/19 11/21 11/22 reason [2] 7/17 7/21 reasonable [1] 4/6 reasons [5] 4/10 6/10 7/21 11/16 11/22 received [1] 9/8 record [4] 4/23 6/25 10/20 11/1 recording [2] 1/9 14/9 regular [1] 9/23 Reid [2] 9/18 11/1 related [2] 6/6 10/11 relates [1] 6/9 relationship [1] 6/16 remainder [1] 10/10 remains [1] 10/3 removal [12] 1/9 2/12 2/15 2/21 2/25 3/5 4/16 5/20 7/17 12/18 13/6 13/7 render [1] 8/13 reopening [1] 10/22 REPORTED [1] 1/21 Reporter [2] 1/21 14/12 represent [1] 11/18 required [4] 4/24 5/2 8/11 9/15 requiring [1] 5/13 reset [3] 5/4 5/19 12/17 resolution [1] 9/3 resolve [3] 5/24 6/2 6/20 respectfully [1] 9/5 respond [1] 8/10 result [2] 4/13 9/10 revisit [1] 13/13 RICHARD [2] 1/18 2/8 right [1] 6/1 rights [1] 3/19 RMR [2] 1/21 14/11</p> <p><b>S</b></p> <p>said [5] 5/1 5/14 5/15 7/13 7/21 sake [1] 7/19</p>	<p>same [4] 7/23 10/15 10/20 10/21 SANCHEZ [1] 1/10 Saturday [1] 11/25 saw [1] 5/10 say [3] 3/18 5/8 11/11 saying [1] 8/3 scheduled [1] 12/23 SE [1] 1/19 second [1] 3/24 see [2] 7/17 11/2 seems [1] 5/8 set [3] 10/6 10/7 11/15 severe [2] 4/11 6/11 Shapiro [1] 7/23 She [1] 7/23 should [5] 6/24 8/6 9/17 10/20 12/20 shouldn't [1] 10/18 simply [2] 9/18 9/21 since [3] 2/13 5/18 12/25 sit [1] 2/18 sitting [1] 5/6 situation [1] 6/18 so [17] some [3] 6/12 8/11 8/20 something [7] 3/18 6/13 9/3 12/11 12/14 12/20 12/20 sorry [1] 2/23 SOUTHERN [3] 1/1 1/14 3/25 special [1] 9/2 spouse [1] 7/23 stand [1] 7/6 start [1] 9/19 started [1] 9/21 stated [1] 6/10 STATES [5] 1/1 1/3 1/10 1/13 1/16 stay [5] 9/4 12/20 13/7 13/12 13/19 stipulated [1] 4/17 stop [1] 11/24 Street [3] 1/16 1/22 14/12 Suite [1] 1/19 sure [4] 2/19 6/4 8/9 10/18 surgical [1] 4/12</p> <p><b>T</b></p> <p>table [1] 5/6 take [1] 6/21 takes [1] 13/15 taking [1] 13/18 tell [1] 5/12 terms [4] 10/1 10/14 11/9 13/6 than [2] 10/22 12/8 thank [4] 3/9 13/1 13/23 14/2 that [73] that's [11] 6/1 6/6 7/3 8/6 8/11 8/25 9/1 9/5 11/5 11/8 11/13 then [3] 5/4 13/14 13/17 theory [1] 9/17 there [10] 3/11 4/9 5/18 8/16 9/6 10/21 11/14 11/18 11/22 13/24 these [2] 7/21 11/1 they [11] 3/18 4/2 4/17 5/3 7/5 8/12 9/3 9/3 10/25 10/25 11/2 things [4] 6/12 9/22 10/23 11/2 think [19] thinks [1] 8/6 third [1] 9/14</p>
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<p><b>T</b></p> <p>this [32]  those [1] 10/23  thought [4] 5/12 5/17 6/13 10/7  through [6] 4/11 4/12 6/18 13/20 13/22 13/23  throughout [1] 3/17  time [9] 4/4 4/17 5/19 6/22 7/10 7/14 9/14 11/24 13/16  today [11] 5/13 5/22 5/25 6/3 6/20 7/9 7/15 7/18 8/5 12/19 12/22  today's [1] 12/7  together [2] 7/20 9/22  told [1] 7/9  Torres [2] 10/21 12/24  TRANSCRIBED [1] 1/9  transcript [1] 12/7  transcription [1] 14/8  transit [1] 13/10  traveling [2] 7/11 8/18  treat [1] 9/22  treatment [1] 9/2  try [2] 11/7 11/8  trying [3] 4/6 9/23 11/8  Tuesday [13] 12/1 12/8 12/11 12/16 12/18 12/24 13/8 13/12 13/13 13/19 13/20 13/22 13/23  turned [1] 6/13  two [2] 10/2 11/2</p>	<p><b>U</b></p> <p>under [2] 5/17 9/17  understand [8] 5/9 5/10 5/16 6/19 6/22 8/2 10/12 11/14  understanding [5] 4/2 5/23 7/3 8/25 9/1  understands [1] 5/10  Understood [1] 8/15  unexpected [1] 6/12  unfortunate [1] 7/22  UNITED [5] 1/1 1/3 1/10 1/13 1/16  unless [1] 7/4  until [5] 4/9 4/18 13/7 13/13 13/19  up [2] 7/21 9/18  urge [1] 7/20  us [5] 3/20 7/9 7/12 7/13 8/18  used [1] 8/23</p>	<p><b>U</b></p> <p>weren't [1] 5/2  West [2] 1/22 14/13  what [5] 5/14 8/2 9/7 10/3 10/20  whatever [2] 11/9 12/1  when [7] 3/13 3/20 10/14 10/16 12/4 12/6 12/23  Whenever [1] 9/6  where [2] 5/16 5/17  whether [3] 4/23 12/19 12/20  which [5] 3/17 4/16 6/11 9/23 12/7  while [1] 7/16  who [7] 4/20 5/5 5/6 6/7 8/12 9/11 10/2  whole [1] 6/17  why [1] 6/6  will [17]  willing [2] 7/17 12/12  WILSON [3] 1/18 2/8 2/11  without [1] 8/12  witness [7] 3/23 3/25 4/4 4/7 4/16 4/24 5/2  witnessed [1] 8/23  witnesses [1] 5/13  word [1] 6/21  work [3] 12/9 12/11 12/16  works [1] 9/1  would [23]</p>
<p><b>U</b></p> <p>under [2] 5/17 9/17  understand [8] 5/9 5/10 5/16 6/19 6/22 8/2 10/12 11/14  understanding [5] 4/2 5/23 7/3 8/25 9/1  understands [1] 5/10  Understood [1] 8/15  unexpected [1] 6/12  unfortunate [1] 7/22  UNITED [5] 1/1 1/3 1/10 1/13 1/16  unless [1] 7/4  until [5] 4/9 4/18 13/7 13/13 13/19  up [2] 7/21 9/18  urge [1] 7/20  us [5] 3/20 7/9 7/12 7/13 8/18  used [1] 8/23</p>	<p><b>Y</b></p> <p>Yes [1] 2/16  yesterday [1] 4/12  York [5] 1/14 1/14 1/14 4/1 13/9  you [30]  your [34]</p>	
<p><b>V</b></p> <p>very [5] 4/25 6/11 6/15 7/24 13/2  vouch [1] 7/23  vs [1] 1/5</p>		
<p><b>W</b></p> <p>want [11] 4/18 8/7 8/7 8/9 9/3 10/25 11/11 11/13 12/6 12/13 12/19  wants [2] 4/15 12/1  was [24]  way [2] 9/1 11/5  we [67]  week [11] 4/9 4/18 5/5 5/20 5/24 6/1 6/17 9/7 11/10 12/2 12/4  weekend [1] 12/14  well [1] 11/23  wells [5] 1/21 1/23 14/11 14/11 14/13  went [1] 6/18  were [7] 3/14 4/25 7/7 8/12 10/8 11/14</p>		

**MINUTE ORDER**

Page 2

**Chief Magistrate Judge Edwin G. Torres****King Building Courtroom 10-5**

Date: 1/7/2025

Time: 1:30 p.m.

Defendant: Oren Alexander J#: 52667-511 Case #: 24-04616-MJ-D'ANGELOAUSA: **Tom Haggerty** Attorney: Richard Carroll Klugh, Jr. (Retained)Violation: WARR/SD-NY/Conspiracy to Commit Sex Trafficking;  
Sex Trafficking by Force Surr/Arrest Date:            YOB:           Proceeding: Removal/Pretrial Detention Hearing CJA Appt:           Bond/PTD Held: ☐ Yes ☐ No Recommended Bond: Pretrial DetentionBond Set at:            Co-signed by:           ☐ Surrender and/or do not obtain passports/travel docsLanguage: **English**☐ Report to PTS as directed/or            x's a week/month by  
phone:            x's a week/month in person

Disposition:

Brady Order NOT given.

\*Defendant not present; due to  
miscommunication with USMS.\*Defendant reset for Removal/PTD on  
1/8/25 at 3:30pm before Duty Judge.

Random urine testing by Pretrial

☐ Services

Treatment as deemed necessary

☐ Refrain from excessive use of alcohol☐ Participate in mental health assessment & treatment☐ Maintain or seek full-time employment/education☐ No contact with victims/witnesses, except through counsel☐ No firearms☐ Not to encumber property☐ May not visit transportation establishments☐ Home Confinement/Electronic Monitoring and/orCurfew            pm to            am, paid by           ☐ Allowances: Medical needs, court appearances, attorney visits,  
religious, employment☐ Travel extended to:           ☐ Other:           Time from today to            excluded  
from Speedy Trial Clock**NEXT COURT APPEARANCE** Date:            Time:            Judge:            Place:           Report RE Counsel:           PTD/Bond Hearing:           Prelim/Arraign or Removal: **1/8/25** **1:30PM** **DUTY JUDGE** **MIAMI**Status Conference RE:           D.A.R. **13:45:17** Time in Court: **1 min**s/Edwin G. Torres

Chief Magistrate Judge



## MINUTE ORDER

Page 1

## Magistrate Judge Edwin G. Torres

King Building Courtroom 10-5

Date: 1/7/2025

Time: 3:30 p.m.

Defendant: Oren Alexander J#: 52667-511 Case #: 24-04616-MJ-D'ANGELOAUSA: Timothy Abraham Attorney: Howard for Richard Klugh, Jr. (RETAINED)Violation: WARR/SD-NY/S-IND/Conspiracy to commit sex trafficking by force, fraud, & coercionSurr/Arrest Date: YOB:Proceeding: Pretrial Detention/Removal Hearing CJA Appt: \_\_\_\_\_Bond/PTD Held: ☐ Yes ☐ No Recommended Bond: \_\_\_\_\_Bond Set at: **STIP-Pretrial Detention**

Co-signed by: \_\_\_\_\_

☐ Surrender and/or do not obtain passports/travel docsLanguage: English☐ Report to PTS as directed/or \_\_\_\_\_ x's a week/month by phone: \_\_\_\_\_ x's a week/month in person

Random urine testing by Pretrial

☐ Services \_\_\_\_\_

Treatment as deemed necessary

☐ Refrain from excessive use of alcohol☐ Participate in mental health assessment & treatment☐ Maintain or seek full-time employment/education☐ No contact with victims/witnesses, except through counsel☐ No firearms☐ Not to encumber property☐ May not visit transportation establishments☐ Home Confinement/Electronic Monitoring and/or

Curfew \_\_\_\_\_ pm to \_\_\_\_\_ am, paid by \_\_\_\_\_

☐ Allowances: Medical needs, court appearances, attorney visits, religious, employment☐ Travel extended to: \_\_\_\_\_☐ Other: \_\_\_\_\_

Disposition:

Brady Order NOT given.

**Defendant waives removal. Waiver****executed. The parties stipulate to****PTD w/th eright to revisit.****No hearing held.****Defendant ordered removed to the district New York.**

Time from today to \_\_\_\_\_ excluded from Speedy Trial Clock

NEXT COURT APPEARANCE

Date:

Time:

Judge:

Place:

Report RE Counsel: \_\_\_\_\_

PTD/Bond Hearing: \_\_\_\_\_

Prelim/Arraign or Removal: \_\_\_\_\_

Status Conference RE: \_\_\_\_\_

D.A.R. **14:38:57**Time in Court: **2 mins**

s/Edwin G. Torres

Magistrate Judge

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**U.S. District Court**

**Southern District of Florida**

**Notice of Electronic Filing**

The following transaction was entered on 1/8/2025 at 1:28 PM EST and filed on 1/8/2025

**Case Name:** USA v. Alexander et al  
**Case Number:** 1:24-mj-04616-EFD  
**Filer:**  
**Document Number:** 30(No document attached)  
**Docket Text:**  
**PAPERLESS Order Cancelling Pretrial Detention Hearing as to Oren Alexander**

Upon stipulation of the parties, the pre-trial detention hearing set for 01/08/25 at 3:30 PM is cancelled.

Signed by Chief Magistrate Judge Edwin G. Torres on 1/8/2025. (MJS)

**1:24-mj-04616-EFD-2 Notice has been electronically mailed to:**

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Howard Milton Srebnick &nbsp; &nbsp; HSrebnick@RoyBlack.com, blacksrebnick@ecf.courtdrive.com, hreiner@royblack.com

Joel M. Denaro &nbsp; &nbsp; jdenaro@joeldenarolaw.com

Lauren Alexandra Astigarraga &nbsp; &nbsp; lauren.astigarraga@usdoj.gov, Andrea.Samper@usdoj.gov, CaseView.ECF@usdoj.gov, usafls-hqdk@usdoj.gov

Richard Carroll Klugh , Jr &nbsp; &nbsp; rickklu@aol.com, allison.bradley@uprfirm.com,

klughlawoffice@gmail.com

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--Non Case Participants: United States Pretrial, Probation and PSIunit Office (Court Desk) (flsp\_cd@flsp.uscourts.gov)  
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**U.S. District Court**

**Southern District of Florida**

**Notice of Electronic Filing**

The following transaction was entered on 1/8/2025 at 1:31 PM EST and filed on 1/8/2025

**Case Name:** USA v. Alexander et al

**Case Number:** 1:24-mj-04616-EFD

**Filer:**

**Document Number:** 31(No document attached)

**Docket Text:**

**PAPERLESS Order Setting Removal Hearing as to Oren Alexander**

A Removal Hearing for Defendant Oren Alexander is set for the Duty Calendar on 1/9/2025 at 01:30 PM in the Miami Division before Chief Magistrate Judge Edwin G. Torres.

Signed by Chief Magistrate Judge Edwin G. Torres on 1/8/2025. (MJS)

**1:24-mj-04616-EFD-2 Notice has been electronically mailed to:**

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Joel M. Denaro &nbsp; &nbsp; jdenaro@joeldenarolaw.com

Lauren Alexandra Astigarraga &nbsp; &nbsp; lauren.astigarraga@usdoj.gov, Andrea.Samper@usdoj.gov, CaseView.ECF@usdoj.gov, usafls-hqdk@usdoj.gov

Richard Carroll Klugh , Jr &nbsp; &nbsp;rickklu@aol.com, allison.bradley@uprfirm.com,  
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--Case Participants: Noticing AUSA CR TP/SR (usafls.transferprob@usdoj.gov), Richard Carroll Klugh, Jr (allison.bradley@uprfirm.com, klughlawoffice@gmail.com, rickklu@aol.com), Howard Milton Srebnick (blacksrebnick@ecf.courtdrive.com, hreiner@royblack.com, hsrebnick@royblack.com), Lauren Alexandra Astigarraga (andrea.samper@usdoj.gov, caseview.ecf@usdoj.gov, lauren.astigarraga@usdoj.gov, usafls-hqdk@usdoj.gov), Joel M. Denaro (jdenaro@joeldenarolaw.com), Magistrate Judge Ellen F. D'Angelo (dangelo@flsd.uscourts.gov)  
--Non Case Participants: United States Pretrial, Probation and PSIunit Office (Court Desk) (flsp\_cd@flsp.uscourts.gov)  
--No Notice Sent:  
  
Message-Id:25092131@flsd.uscourts.gov  
Subject:Activity in Case 1:24-mj-04616-EFD USA v. Alexander et al Order Setting/Resetting/Cancelling Hearing  
Content-Type: text/html

**U.S. District Court**

**Southern District of Florida**

**Notice of Electronic Filing**

The following transaction was entered on 1/8/2025 at 1:44 PM EST and filed on 1/8/2025

**Case Name:** USA v. Alexander et al

**Case Number:** 1:24-mj-04616-EFD

**Filer:**

**Document Number:** 32(No document attached)

**Docket Text:**

**PAPERLESS Order Resetting Removal Hearing as to Oren Alexander**

The Removal Hearing previously set for 1/9/2025 is now placed on the 1/8/2025 Duty Calendar in the Miami Division before Ch. Magistrate Judge Edwin G. Torres.

Signed by Chief Magistrate Judge Edwin G. Torres on 1/8/2025. (MJS)

**1:24-mj-04616-EFD-2 Notice has been electronically mailed to:**

Noticing AUSA CR TP/SR &nbsp; &nbsp; Usafls.transferprob@usdoj.gov

Howard Milton Srebnick &nbsp; &nbsp; HSrebnick@RoyBlack.com, blacksrebnick@ecf.courtdrive.com, hreiner@royblack.com

Joel M. Denaro &nbsp; &nbsp; jdenaro@joeldenarolaw.com

Lauren Alexandra Astigarraga &nbsp; &nbsp; lauren.astigarraga@usdoj.gov, Andrea.Samper@usdoj.gov, CaseView.ECF@usdoj.gov, usafls-hqdk@usdoj.gov

Richard Carroll Klugh , Jr &nbsp; &nbsp; rickklu@aol.com, allison.bradley@uprfirm.com,  
klughlawoffice@gmail.com

**1:24-mj-04616-EFD-2 Notice has not been delivered electronically to those listed below and will be provided by other means. For further assistance, please contact our Help Desk at 1-888-318-2260.:**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
Case No: 24-04616-MJ-D'ANGELO

United States of America  
Plaintiff,  
v.

Charging District's Case No. 24-CR-676

Oren Alexander,  
Defendant.

**WAIVER OF RULE 5 & 5.1 REMOVAL/IDENTITY HEARINGS**

I understand that I have been charged in another district, the **Southern District of New York**.

I have been informed of the charges and of my rights to:

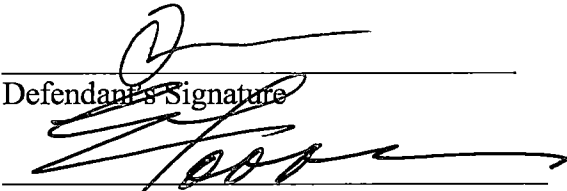

- (1) retain counsel or request the assignment of counsel if I am unable to retain counsel;
- (2) an identity hearing to determine whether I am the person named in the charges;
- (3) production of the warrant, a certified copy of the warrant, or a reliable electronic copy of either;
- (4) a preliminary hearing within 14 days of my first appearance if I am in custody and 21 days otherwise — unless I am indicted — to determine whether there is probable cause to believe that an offense has been committed;
- (5) a hearing on any motion by the government for detention;
- (6) request transfer of the proceedings to this district under Fed. R. Crim. P. 20, to plead guilty.

I agree to waive my rights to: **(check those that apply)**

- ☐ An identity hearing and production of the warrant.
- ☐ A preliminary hearing.
- ☒ A detention hearing in the Southern District of Florida.
- ☒ An identity hearing, production of the warrant, and any preliminary or detention hearing to which I may be entitled to in this district. I request that those hearings be held in the prosecuting district, at a time set by that court.

I consent to the issuance of an order requiring my appearance in the prosecuting district where the charges are pending against me.

Date: 1/8/2025

  
Defendant's Signature  
  
Edwin G. Torres  
United States Magistrate Judge

**United States District Court**  
**Southern District of Florida**  
Case No. 24-04616-MJ-D'ANGELO

UNITED STATES OF AMERICA,

v.

Charging District's Case No. 24-CR-676

Oren Alexander,  
(USM# 52667-511)

COMMITMENT TO ANOTHER DISTRICT

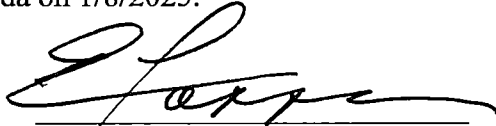
The defendant has been ordered to appear in the Southern District of New York.

Richard Klugh, Jr. **was appointed to represent Defendant for proceedings in this District.**

The defendant remains in custody after the initial appearance in the Southern District of Florida.

**IT IS ORDERED** that the United States marshal must transport the defendant, together with a copy of this order, to the charging district and deliver the defendant to the United States marshal for that district, or to another officer authorized to receive the defendant. The marshal or officer in the charging district should immediately notify the United States attorney and the clerk of court for that district of the defendant's arrival so that further proceedings may be promptly scheduled. The clerk of this district must promptly transmit the papers and any bail to the charging district.

**DONE AND ORDERED** at Miami, Florida on 1/8/2025.

  
Edwin G. Torres  
United States Magistrate Judge